

EIS NO. FHWA-LA-EIS-00-01-F

## RECORD OF DECISION

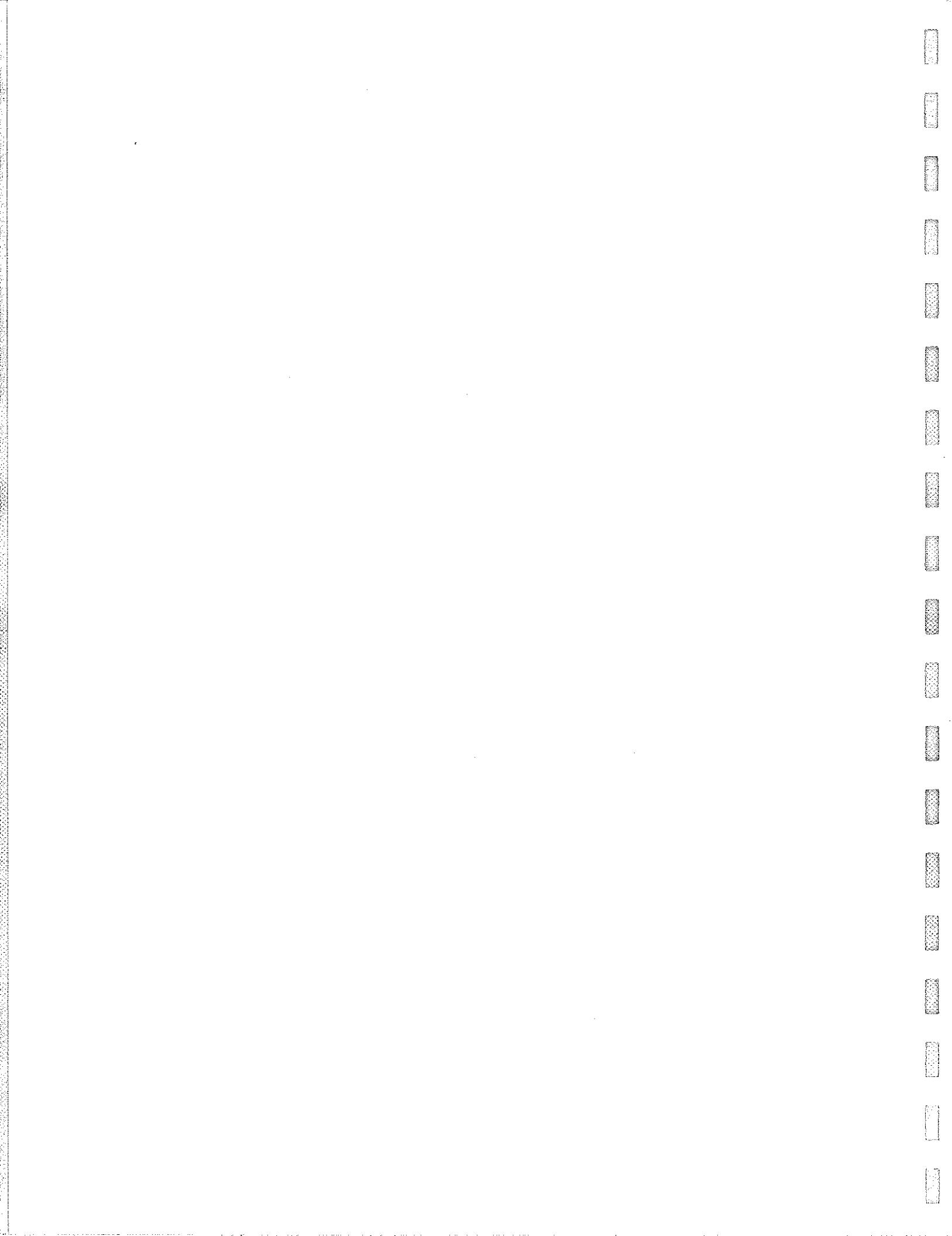
# I-49 CONNECTOR

Lafayette, Louisiana

January, 2003

FEDERAL AID PROJECT NO. DE-0009(802)





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**U.S. Department of Transportation  
Federal Highway Administration**

FEDERAL AID PROJECT NO. DE-0009(802)  
STATE PROJECT NO. 700-24-0073



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## Summary of Comments and Responses

**APPENDIX B:** LCG Department of Traffic and Transportation - MPO Comprehensive Plans:

- Evangeline Thruway Internal and External Traffic
- Interstate 49 Lafayette RR-4, Eastern Bypass, and Eastern Alignment Traffic Scenarios

## 1. DECISION

### 1.1. Summary of Decision

This Record of Decision (ROD) approves the Selected Alternative for the I-49 Connector from just south of the Lafayette Regional Airport north to the current southern terminus of Interstate 49 at the Interstate 10/Interstate 49 interchange, as described in the Final Environmental Impact Statement (EIS) issued September 2002. The Final EIS studied the proposed construction of a six-lane fully controlled access freeway, approximately five miles in length, generally along the existing U.S. 90/U.S. 167 corridor (Evangeline Thruway) in urban Lafayette. The Selected Alternative is described as Alternative RR-4 Elevated and includes the MPO Subalternative and Subalternative H. This decision is based on analyses contained in the Draft EIS issued in November 2000; the Final EIS; the comments of federal and state agencies, members of the public, and elected officials; and other information in the record in this matter. Following the approval of this ROD, the project will then be able to begin provisions to preserve the I-49 Alignment through use of the LCG Corridor Preservation and Management Action Plan and as funding becomes available, design and construction will be implemented.

## 2. ALTERNATIVES CONSIDERED

### 2.1. Alternatives History and Description

An I-49 Connector Draft EIS was prepared for the Evangeline Thruway study corridor and distributed in May 1992. The Draft EIS considered six freeway type alternatives on four alignments, as well as a no-action alternative. Four of the freeway type alternatives were continuously elevated in the developed urban core area of the project, while two of the freeway alternatives were depressed below grade. At the conclusion of the Public Hearing, this Draft EIS was withdrawn by notice in the Federal Register dated December 11, 1992.

In 1993, the Lafayette Regional Planning Commission acting in its role as the Metropolitan Planning Organization prepared a study entitled Path To Progress to determine the most appropriate corridor for the I-49 Connector to meet purpose and need. This study considered four corridors consisting of a western bypass, a near eastern bypass, a far eastern bypass, and the Evangeline Thruway corridor. This study concluded that the Evangeline Thruway corridor was the one that would best satisfy the purpose and need for the I-49 Connector.

In December 1997, the Draft EIS for the I-49 Connector was reopened with a reconciled set of six primary alternatives within the Evangeline Thruway corridor. The four alignments from the 1991 Draft EIS were retained. The four elevated freeway types were retained as well, but the depressed freeway types were marginally feasible hydraulically and were deemed not safe or practical for the project, and thus were rejected for further study. Instead, two selected overpass alternatives were included in the alternatives set. The six alternatives on four alignments include various combinations of the existing alignment (EA) of the Evangeline Thruway/U.S. 90/U.S. 167 and the area directly adjacent to the Union Pacific Railroad (RR). These alternatives are listed below:

- ◆ EA-1 Elevated
- ◆ EA-1 Selected Overpasses
- ◆ RR-3 Elevated
- ◆ RR-3 Selected Overpasses
- ◆ RR-4 Elevated
- ◆ RR-5 Elevated

The logical termini and length of highway covered by these alternatives are adequate to preclude questions on "piecemealing." Three general principles are contained in 23 CFR 771.111(f) that are to be used to frame a highway project. As stated in the regulations, "In order to ensure meaningful

evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated, the action evaluated in each EIS or finding of no significant impact shall:

1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope,
2. Have independent utility or independent significance, and
3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

The proposed project meets these requirements. It has logical termini and independent utility and does not restrict consideration of other transportation improvements in the area (for instance an east or west bypass or loop). Section 1.3.1, System Linkage, of the Final EIS demonstrates the I-49 Connector's compatibility with other transportation projects in the region. That it meets the three requirements is true even if no other portions of I-49 South are built.

The project is demonstrated to meet logical termini and have independent utility as it meets the following components of the Purpose and Need:

- System Linkage – Connection of I-10 and I-49 north of Lafayette to U.S. 90 and U.S. 167; connection of I-10 and full freeway service to Lafayette Regional Airport (LRA); freeway connection to downtown multi-modal transit center; improved access to Beaver Park and other park facilities; freeway connectivity to the CBD; improved connectivity and compatibility with the existing and planned roadway network including University Avenue extension and Verot School Road extension (FEIS Section 1.3.1).
- Relieve existing and projected traffic in existing Evangeline Thruway corridor (FEIS Section 1.3.2).
- Long standing, numerous regional transportation plans that have identified the need for a freeway in the Evangeline Thruway corridor (FEIS Section 1.3.3).
- Meets intent of original enabling federal legislation and has local agency and governmental support (FEIS Section 1.3.4).
- Has beneficial intermodal relationships including rail, air, and bus transit connections. (FEIS Section 1.3.5).
- Provides improved safety in the corridor (FEIS Section 1.3.6).
- Hurricane evacuation – Eliminates the “choke point” for evacuation from the south on U.S. 90 in Lafayette, with 15 signalized intersections in the 5-mile I-49 Connector study area. This constriction was proven during Hurricane Andrew in 1992 (FEIS Section 1.3.7).
- Increased Mobility – Increasing capacity in the Evangeline Thruway corridor will tend to attract traffic from other congested area roadways

(such as University), thus increasing regional mobility (FEIS Section 1.3.8.b).

The above illustrates the value of the I-49 Connector as a stand-alone project. Connectivity of this portion to other portions is not required for the I-49 Connector to meet its independent Purpose and Need.

The Final EIS contains an adequate detailed statement of the following: description of the proposed project; need for the project; alternatives; affected environment; environmental consequences; and comments and coordination.

The Draft and Final EIS have been coordinated with appropriate local, state, and federal agencies and also made available for public comment and at the public hearing. The comments received have been adequately addressed in the Final EIS and this ROD. The Final EIS has been endorsed by appropriate local, state, and federal agencies.

As part of the effort to address comments that arose during the review of the Final EIS, updated studies utilizing the most recent traffic data have been performed. See Appendix B of this ROD. The studies show that the Evangeline Thruway central corridor, which includes the RR-4 Selected Alternative, best meets a primary purpose and need of the project to relieve existing traffic congestion. Routes that are further removed to the east do not attract as much existing traffic. A primary reason for this is that most of the existing traffic is local, with only approximately 9% through traffic in the corridor.

## **2.2. Selected Alternative**

Given the urban, developed, nature of the project area, each of the alternatives considered will have impacts regarding the value factors present. Primary value factors that are present for each of the alternatives include displacements, visual impacts at the Sterling Grove Historic District, noise impacts, community planning, hazardous waste sites, the Chicot Aquifer (sole source), traffic circulation and land access, and access to the central business district. Lesser value factors also exist that are common to all of the alternatives. Some alternatives may have fewer impacts than others with regard to the value factors.

The Selected Alternative approved in this ROD is the Lafayette Consolidated Government's (LCG) locally preferred alternative, which has been identified as RR-4 Elevated in conjunction with the MPO Subalternative and Subalternative H. This alternative uses parts of the existing Evangeline Thruway alignment as well as a new alignment adjacent the Union Pacific Railroad. Upon reviewing the Draft EIS, comments received following the

Draft EIS Public Hearing, and local agency recommendations, the LCG adopted the RR-4 Elevated alignment as the locally preferred alternative for I-49 through Lafayette. The locally preferred alternative included a request by the LCG to keep two local collector streets open under the freeway. This request, identified as the MPO Subalternative, was determined to be feasible by the LaDOTD and has been included in the Selected Alternative. Subalternative H applies to the area north of Willow Street. The selected RR-4 alignment, as well as other alignments that were considered, are shown on Exhibit 2-1 in the Final EIS. The MPO Subalternative and Subalternative F are shown in Appendix A, as well as more detail regarding the RR-4 Elevated alternative. Chapter 2 provides a text description and other information regarding project alternatives.

The Selected Alternative decision represents a balance of impacts, in which certain factors were weighed against others in reaching a decision. Three factors that stand out as the most favorable regarding the Selected Alternative are summarized below:

- The Selected Alternative would require the least number of residential displacements.
- The Selected Alternative moves traffic (both the proposed freeway and existing Evangeline Thruway) farther from the Sterling Grove Historic District than other alternatives (except RR-3, which is on the same alignment as the Selected Alternative in the area of the District). Thus, the Selected Alternative is more conducive for preserving and enhancing the District, including St. Genevieve Catholic Church and School.
- The Selected Alternative is on new alignment in the core area, and as such is geometrically able to offer more direct access opportunities to the central business district.

With the exception of wetlands and hazardous waste sites, the Selected Alternative would not have any additional substantial environmental impacts when compared to the other alternatives considered in the Final EIS. This includes areas such as community planning, impacts to the Chicot Aquifer, and noise. Regarding wetlands, the Selected Alternative requires a 350' displacement of a runway at the Lafayette Regional Airport. This in turn will impact approximately five acres of wetlands that would not be impacted by Alternatives RR-3 and RR-5. This impact is considered to be more than offset by the avoidance of numerous residential, business, and public facilities that lie in the path of RR-3 and RR-5 and would be displaced by those alternatives.

### **2.3. Selection Of A Construction Alternative Over The No-Action Alternative**

Construction of the Selected Alternative will cause some unavoidable, adverse impacts; however, it is the alternative that best balances the identified transportation needs of the project area with project impacts. The No-Action alternative provides a benchmark for environmental analysis but does not meet the project purpose and need and during the Final EIS has been dropped from further consideration as a viable alternative. Therefore, the Selected Alternative is the "environmentally preferred alternative" for purposes of 40 CFR 1502.2(b) because it best meets the project purpose and need and balances impacts overall.

### 3. MEASURES TO MINIMIZE HARM

The development of alternatives, both alignments and freeway types, considered both human and natural environmental factors. During the preliminary studies and development of the alternatives, efforts were made to identify alignment and typical section features that would minimize impacts. After showing that a resource or other feature could not be avoided, mitigation measures and other commitments to minimize harm were developed. The discussion below identifies key project related areas where mitigation and other measures to minimize harm have been addressed. The specific mitigation measures and commitments to minimize harm are listed.

#### 3.1. Displacements

Avoiding densely populated areas evident in project mapping and field studies was considered to minimize the number of displacements. Therefore, all of the proposed alignments presented in the Final EIS primarily follow the existing Evangeline Thruway alignment, utilizing existing right-of-way where possible. In the central core area where the Thruway is a couplet the one block area between the two directional roadways is a developed area, primarily residential with some small businesses. Therefore, alternatives on new alignment adjacent to the Union Pacific Railroad were considered. The Selected Alternative utilizes the new alignment section in the central core in part because it minimizes residential displacements.

Impacts to the neighborhoods in the vicinity of the cross streets will be minimized by the selection of the elevated freeway alternative for the project, rather than the selected overpasses alternative. The selected overpasses alternative would require overpasses on the key cross streets, with construction impacts due to vertical geometry extending a minimum of 500' into the neighborhoods and other areas on each side of the Thruway. With each cross street elevated 15 - 20 feet to cross over the freeway, the existing ground level Thruway could not intersect with the cross streets to provide local traffic circulation and access or provide movements to and from the freeway. If the existing Thruway were raised to the level of the overpass crossing streets, this would require extensive right-of-way acquisitions and retaining walls, and would block access to those residential and business properties adjacent to the thruway. Traffic operating characteristics would be severely hindered and the severe relocations and other adverse socioeconomic impacts of this concept due to the cross street overpasses are over and above the impacts caused by the elevated freeway alternative that has been selected.

Based on the Final EIS studies, there is no practical alternative that will further minimize residential and commercial impacts.

The funding source for right-of-way acquisition and construction of the I-49 Connector is not currently known. Therefore, a corridor preservation plan has been developed to guide development in the corridor and allow for limited right-of-way acquisition over time until such funding becomes available. The LCG Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment is the subject of a Joint Cooperative Endeavor Agreement between the FHWA, the LaDOTD, and the LCG and is a basis of this Record of Decision. One component of the corridor preservation plan includes replacement housing for displacees. This component of the plan meets the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and is considered to be a Last Resort Housing plan as required.

### COMMITMENT

Relocations and housing needs will be handled in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments of 1987. These items are addressed additionally in the Lafayette Consolidated Government (LCG) Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment. Provisions regarding right-of-way acquisition, relocation assistance, and last resort housing will be upheld over time by LaDOTD with oversight by FHWA as stated in the LCG Corridor Preservation and Management Action Plan. This plan is part of the Joint Cooperative Endeavor Agreement, which is contained in the Final EIS.

### **3.2. Standing Structures and Archaeological Investigations**

Standing structures and archaeological resources exist within the I-49 Connector study corridor. These features were inventoried and mapped during the alternatives development process. Measures were taken to avoid impact to any of the properties listed on or eligible for listing on the National Register of Historic Places (NRHP), and the Selected Alternative accomplishes this. The Selected Alternative also avoids any impacts to two potential archaeological historic sites.

A Section 106 study was performed in compliance with the National Historic Preservation Act. Unavoidable visual impacts have been determined to occur at the Sterling Grove Historic District as a result of the Selected Alternative. A Memorandum of Agreement (MOA) was signed by FHWA, LaDOTD, the Advisory Council on Historic Preservation (AChP), the Louisiana State Historic Preservation Officer (SHPO), and endorsed by the three committees of the Lafayette Metropolitan Planning Organization

(MPO) and the Lafayette City-Parish Planning Commission as consulting parties. The visual impacts identified from the Section 106 process will be mitigated as described in Section 3.3 of this ROD (*Sterling Grove Historic District*).

### COMMITMENT

A Plan of Archaeological Investigations for the Selected Alternative has also been established as part of an MOA for the project amongst the FHWA, LaDOTD, Louisiana SHPO, and the Advisory Council. The Plan document provides for completing the archaeological investigations required under Section 106 in conjunction with the corridor preservation plan developed for the project and the anticipated gradual acquisition of right-of-way.

The FHWA and DOTD will ensure that the investigation provisions of the Plan of Archaeological Investigations are carried out as stated in the MOA.

### MITIGATION

If needed, based on the investigations, appropriate mitigation will be coordinated in conjunction with the Louisiana State Historic Preservation Officer (SHPO).

### **3.3. Sterling Grove Historic District**

Impacts to the Sterling Grove Historic District (SGHD), which includes St. Genevieve Church and Elementary School, were minimized by re-aligning the existing Evangeline Thruway farther away from the District and using a reverse curve in the proposed freeway alignment to move it away from the District as well. The Selected Alternative (along with the RR-3 alignment that was not selected) gives the most clearance, approximately 280 feet, from the elevated Connector freeway to the face of the St. Genevieve Church. Additionally, the existing ground level northbound Thruway would be relocated to the west away from the front of the Church. This will also benefit the Church and School by reducing noise and creating space for visual mitigation.

### COMMITMENT

Additional public involvement to detail the mitigation plan for the District has been committed to in the MOA by FHWA and LaDOTD in conjunction with local agencies and the State Historic Preservation Officer.

Within the mitigation plan, LaDOTD will include provisions for landscaping and other measures that will be designed into the construction project. The

types of mitigation measures that will be considered during the design process will include:

- Landscaping
- Earthberms
- Masonry walls
- Special lighting
- Long span bridges
- Attention to use of under bridge areas
- Hardscape and brick paver treatment
- Fencing
- Parks

During the development of the specific details for design and construction in the area, FHWA and LaDOTD shall seek input from Sterling Grove Historic District residents as well as from St. Genevieve Catholic Church and School. Public involvement will occur prior to the formal submittal of the specific details to the State Historic Preservation Officer (SHPO) for approval as specified in the MOA.

If a subsequent discovery or identification of additional historic properties is made, LaDOTD and FHWA, in consultation with the Louisiana SHPO, will ensure that the owners of the additional properties are made aware of the mitigation plan.

### MITIGATION

The Sterling Grove Historic District has been determined to experience an adverse visual impact according to Section 106 as a result of the project. An MOA has been developed with regard to these impacts (see Section 4 of this ROD, *Section 106 Compliance*, for additional information). Visual impacts mitigation will be provided in accordance with the terms contained in the MOA, which is reproduced in Appendix F of the Final EIS. Based on public involvement and agency coordination, the following stipulations have been agreed to and will be carried out by LaDOTD and FHWA:

- The Evangeline Thruway will be realigned further away from St. Genevieve Catholic Church and School and the District to allow for better safety, traffic access, and circulation for the area.
- No right-of-way will be taken from the Sterling Grove Historic District (including side street work).
- Special lighting will be provided in the area directly in front of St. Genevieve Church and School as well as in the rights-of-way adjacent to the church and school,

- A plaza and green space with illumination and landscaping will be developed in the remaining area immediately adjacent to the Church and school,
- A simple decorative fence in the manner of wrought iron with locking gates will be provided to enclose the plaza and green space area,
- Upon completion of and acceptance by LaDOTD and FHWA of the installation of the improvements listed above in the area near the St. Genevieve Church and School the ownership of the property, including all future maintenance requirements for the property, will be transferred to St. Genevieve Catholic Church.
- The conversion of Greig Street to a one-way street extending from Elizabeth Street to a new intersection with Mudd Avenue, and the elimination of its existing intersection with Evangeline Thruway shall be implemented and more fully developed at the time of project design to enhance access to the church and school. The development of a semicircular drive west of the school with associated parking shall also be included as part of the project design and shall be incorporated into the above landscaped area as appropriate.

### **3.4. Other Historic Properties (Eligible for Listing on the National Register of Historic Places)**

During the EIS process in coordination with the State Historic Preservation Officer (SHPO), eight properties in the corridor study area not currently listed were determined eligible for inclusion on the National Register of Historic Places (NRHP). None of the alternatives considered, including the Selected Alternative would relocate any properties on or eligible for listing on the NRHP.

#### **COMMITMENT**

The Wallis Estate (one of the eight properties) includes two buildings and surrounding land. Some right-of-way may be required adjacent to, but not from, the Wallis Estate. During design of the project, FHWA and LaDOTD will strive to minimize right-of-way requirements in this area. The Trappey's Plant Complex, another of the eight properties, lies adjacent to the existing right-of-way that will be utilized for the Selected Alternative. No right-of-way will be required from the Trappey's Plant Complex.

If a subsequent discovery or identification of additional historic properties is made, consultation with the Louisiana SHPO will be conducted by FHWA and LaDOTD to develop an appropriate course of action.

### 3.5.Noise

The peak hour noise levels presented in the Final EIS indicate that there is little acoustical difference between the various proposed alternatives considered in the EIS. The EIS shows that there will be slight increase in noise levels for a majority of the corridor under all alternatives, including the no-build. Under the Selected Alternative, however, throughout the corridor noise levels immediately abutting the Evangeline Thruway, including noise levels at the St. Genevieve Church and School within the Sterling Grove Historic District, will decrease because the ground level Thruway will be relocated farther away from the existing church and school and because through traffic will use the I-49 Connector freeway (which will remove traffic from the local street). Although these noise reductions will be noticeable, the resulting levels will still exceed the LaDOTD's NAC and by definition the residences, schools and churches immediately abutting the Evangeline Thruway would still experience an acoustical impact. Sound walls and other noise reduction measures were considered but determined not practical and feasible according to the LaDOTD's criteria.

Within the Sterling Grove Historic District the second and third tier of homes paralleling the Evangeline Thruway would be exposed to less noise than the St. Genevieve Church and School. These homes would most likely experience an increase from existing noise levels (because the ground level buffer provided by the existing buildings and vegetation would be less effective for an elevated noise source), but the increase would probably not be great enough to meet the LaDOTD's definition of impact.

Interior noise projections and evaluations have been done for the two schools, LeRosen and St. Genevieve Elementary Schools, which are in close proximity to the Selected Alternative. It has been estimated that interior noise levels at LeRosen will increase compared to existing conditions, while interior noise levels at St. Genevieve will decrease compared to existing conditions. These interior noise level projections exceed standards set forth by LaDOTD; therefore noise reduction measures have been identified.

Construction noise is also expected to occur with the proposed project. The major construction elements of this project are expected to be earth removal, hauling, grading, paving, and bridge construction. Construction noise is expected to have temporary impacts upon the residences, churches, schools and businesses that are located immediately adjacent to the project corridor.

## COMMITMENT

### Traffic Noise

Based on the studies completed for the EIS, none of the noise barriers analyzed meet the LaDOTD's definition of reasonableness and feasibility. If it subsequently develops during final design that conditions have substantially changed, abatement measures would be re-evaluated by LaDOTD. A final decision on the reasonableness and feasibility of noise mitigation will be made by LaDOTD and FHWA upon completion of the project design and the public involvement processes.

### Construction Noise

LaDOTD's project engineer will monitor the following areas during the construction period. Construction equipment powered by gasoline or diesel fueled internal combustion engines will be properly muffled and all motor panels will be closed in order to minimize the noise impacts to nearby areas. Shielding of stationary noise sources with temporary noise barriers will be considered at all times. Section 107.15 of the Louisiana Standard Specifications for Roads and Bridges and the FHWA Technical Advisory T 6160 2 dated March 13, 1984, will be referenced for further details on the sources and abatement of construction noise.

### Construction Noise Near Churches

To minimize construction noise impacts to the churches along the corridor, at the beginning of project construction, the LaDOTD's project engineer will contact the churches immediately adjacent to the proposed project to obtain their schedules of regular services as well as the anticipated dates and schedules of Holy Day observances. Construction operations immediately adjacent to churches will cease during weekend services (Saturday and Sunday) or special Holy Day observances. In addition, the LaDOTD will coordinate with churches along the corridor to the extent practicable for unscheduled services such as funerals. It is anticipated that it will be necessary for construction work to take place on Saturday and Sunday in the vicinity of churches in order to minimize disruption to local traffic and businesses during the Monday through Friday workweek.

## **MITIGATION**

### **Traffic Noise**

Walls were considered to diminish the noise levels; however, analysis has shown that none of the areas within the corridor met the LaDOTD's criteria for noise barriers. Noise reduction measures within the corridor are being considered to be funded by local and/or private agencies and organizations. The use by the LCG of a Noise Impact Overlay Zone is one potential opportunity, as it would subject land within the zone not only to common regulations for that zone, but also the developed terms for the overlay zone. Physical methods being considered by LCG for sound abatement include acoustical site planning, architectural design and construction, as well as the construction of noise barriers. Acoustic site planning includes distance barriers, noise-compatible use (parking, open space and commercial) and buildings as barriers or buildings that would not face the highway. Architectural design includes concerns such as building height, room arrangement and window size, number and placement. The LCG will be responsible for any noise mitigation measures for the I-49 Connector project, except as noted in the following paragraph, notwithstanding the re-evaluation commitment made for traffic noise stated on page 10.

### **Interior Noise**

Both the St Genevieve and LeRosen Elementary school campuses are expected to experience noise levels higher than the impact threshold. Based on the data available at the time of this study and the results of this study, it is noted that acoustical windows installed in the LeRosen Computer Laboratory and the St. Genevieve Library would serve to mitigate noise due to the I-49 Connector project. This action should be taken prior to construction of the I-49 Connector so that benefits would accrue both for the construction period and the period of day to day freeway operations thereafter. The LaDOTD could make a direct mitigation payment to the schools based on the estimated costs of the windows as discussed above, with the concurrence of the FHWA and the written agreement of the respective school administrations to implement the installations.

## **3.6 Air Quality**

Based on the air quality study presented in the Final EIS, all alternatives for the proposed project would not cause or contribute to violations of the carbon monoxide (CO) National Ambient Air Quality Standards (NAAQS). In 1995, Lafayette Parish was redesignated by EPA from ozone nonattainment to ozone attainment with limited maintenance plan requirements (40 CFR Parts 52 and 81, August 18, 1995). Since the transportation conformity rule (40 CFR Part 93 Subpart A) applies to maintenance areas, Lafayette Parish

must demonstrate conformity. As an attainment area with limited maintenance plan, a quantitative analysis is not needed for Lafayette Parish to establish conformity. Accordingly, at the request of the LaDOTD and the Lafayette MPO, the FHWA by letter of February 8, 2001, issued a positive conformity determination with regard to the Clean Air Act of 1990 and stated that Lafayette Parish complies with all conformity provisions of the Louisiana State Implementation Plan (SIP). This conformity determination is valid for three years.

### COMMITMENT

During construction of the proposed project, all materials resulting from the clearing and grubbing or demolition will be removed from the project and disposed of by the contractor per applicable regulations. Any burning will be done in accordance with all applicable local laws and ordinances and state laws and regulations.

Measures will be taken to control the dust generated by construction when the control of dust is necessary for the protection and comfort of motorists or area residents and the abatement of particulate emissions.

It is possible that short-term construction impacts could occur due to construction equipment and haul vehicles, depending on contractor method of operations and weather. LaDOTD standard specifications will be employed to minimize these impacts. Traffic congestion during construction is not anticipated to create an impact because the existing roadway essentially will remain in place while the new freeway facility is constructed.

### **3.7 Waste Sites**

Several known contaminated waste sites exist in the corridor as well as numerous underground storage tank locations. All of the project alternatives considered would traverse the areas containing these sites. Some alternatives would have greater impact with regard to the contaminated waste sites while others would have greater impact with regard to the underground storage tanks.

The Selected Alternative traverses two known contaminated sites: the Southern Pacific Transportation Co. tract and the site occupied by Union Pacific, Georgia-Pacific Corp., and Conoco Food Distributing Co., Inc. The possibility that contamination may not be limited to these two sites, but may be prevalent in the general area and thus would warrant additional evaluation has been considered.

The LaDEQ was consulted on November 6, 2001, regarding the contaminated site occupied by Georgia-Pacific Corp., Union Pacific, and

Conco Food Distributing Co., Inc. While Georgia-Pacific Corp. has cleaned its portion of the site to an acceptable industrial level, the LaDEQ has not approved Union Pacific's plan to clean up the Union Pacific and Conco portions of the site. The LaDEQ considers that the proposed roadway would constitute an industrial use and would not require a higher level of clean up than the industrial level remediation contemplated at present.

### COMMITMENT

Special consideration will be made for construction near the area of contaminated waste site(s) along the Selected Alternative alignment. Construction alternatives for the elevated roadway include but are not limited to:

- Excavating to a depth of 15 ft and hauling contaminated soil for disposal at an appropriate offsite location, then backfilling with clean material;
- Excavating to depth of 5 ft, hauling excavated material to an appropriate offsite location, providing a cap over the excavated area, and replacing the excavated 5 ft with clean material;
- Excavating footing locations only; and
- Drilling (instead of pile driving) and using a slurry seal that would prevent contamination from downward migration.

It is possible that unregistered UST's will have leaked and contaminated the surrounding area. The LaDOTD will ensure that permanent closure of UST's in the project right-of-way will follow the procedures set forth in LACXI.905 and LACXI.907 (Louisiana Administrative Code).

A construction plan that includes measures to prevent the spread of hazardous contamination will be developed for review and approval by the LaDEQ.

LaDOTD will ensure that any actions taken with regard to contaminated waste sites will be coordinated with the measures designed to protect the Chicot Aquifer from contamination.

### **3.8 Water Quality**

Impacts to the water quality of the Vermilion River and Chicot Aquifer associated with the proposed project would be similar for all alternatives considered including the Selected Alternative. It is not expected that impacts of the proposed project would be noticeably greater than impacts currently attributable to the existing Thruway.

### COMMITMENT

FHWA and LaDOTD will ensure that any water wells impacted by the construction of the I-49 Connector will be dealt with in accordance with regulations set forth by LaDEQ Ground Water Protection Division (GWPD) Water Well Rules and Standards of the Water Resources Division of LaDOTD, and any other federal, state, or local regulations that may apply. This would include plugging all affected wells (and borings) to prohibit potential entry of contaminants into the Chicot Aquifer. See Section 3.7 of this ROD (*Waste Sites*) and Section 3.9 of this ROD (*Chicot Aquifer*) for commitments concerning waste sites in the corridor and the potential for contamination of the Chicot Aquifer.

Implementation of sediment and erosion control practices such as silt fences, drainage diversions, and matting along with prompt seeding and revegetation of slopes and bare ground will be utilized to minimize temporary erosion and sedimentation problems.

Temporary erosion control procedures to control sediment-laden runoff from unstable construction embankments will be employed to minimize impacts to the Vermilion River during the construction phase of the project.

### **3.9 Chicot Aquifer**

All of the alternatives considered for the project corridor are underlain by the sole source Chicot Aquifer, which covers a large area of south Louisiana. Each of the alternatives considered necessarily would employ construction techniques that would prevent any contamination of the aquifer. Pile driving or excavation operations, with the potential to puncture the existing, confining claybed, are the most significant project components with regard to potential contamination of the Chicot Aquifer from hazardous waste. Hazardous waste sites have been documented to exist in the project corridor and hazardous material could be allowed to enter the aquifer if documented and/or currently unknown contaminated areas are excavated and the confining clay layer is punctured creating a point of recharge.

None of the alternatives would impact primary recharge areas of the Chicot Aquifer, which are located in Beauregard, Allen, and Evangeline Parishes.

Construction impacts to the Chicot Aquifer would be dependent of the depth to the water bearing strata of sand and gravel underlying the Selected Alternative. Utilizing idealized geologic sections prepared by the United States Geological Survey, none of the alternatives would be anticipated to impact the Chicot Aquifer. This determination is further substantiated by recent construction of the University Avenue underpass at the Union Pacific

Railroad. This project included a railroad bridge on piles and excavation for the roadway underpass, neither of which penetrated the aquifer. Avoidance of impacts to the Chicot Aquifer, which is a sole source aquifer, will continue to be coordinated with the EPA and LaDEQ as the I-49 Connector projects continues to develop.

### **COMMITMENT**

The potential for contamination through ground water/surface water interchange will be minimized through special design techniques and plan review procedures that continue to involve the EPA, LaDEQ, and other appropriate agencies. Through such coordination, adequate safeguards will be instituted to assure compliance with state and federal regulations.

The actual aquifer layer will be identified at the time of the design phase when borings are obtained for design purposes. Design measures and construction techniques will be utilized to guard against contamination of the aquifer. See Section 3.7 of this ROD (*Wastes Sites*).

During the construction phase of the project, close coordination with LaDEQ and EPA will be maintained to assure that adequate protection is maintained for the Chicot Aquifer.

### **3.10 Lafayette Regional Airport Runway/ Taxiway Displacement**

The Lafayette Regional Airport lies adjacent to the existing Evangeline Thruway in the southeast quadrant of the corridor. The Selected Alternative would require the displacement of Runway 11-29. This would be needed in order for the I-49 overpass at the University/Surrey Street interchange to remain under the FAR Part 77 approach surface. This requires a 350' displacement of Runway 11-29. Three hundred and fifty feet of the existing runway would be removed from its northwest end, and the southeast end of the runway would be extended 350'. The existing 200' overrun area on the southeast end of the runway would be reconstructed at the end of the 350' extension of the runway.

The runway's taxiway would also be extended on the southeast end of Runway 11-29 and displaced on the northwest end in order to accommodate the runway displacement. Related actions to the runway/taxiway extensions would be a relocated ARFF/perimeter road on the southeastern end, new runway lights, runway end indicator lights, runway alignment indicator lights, and pavement markings. The existing 350' of runway pavement on the northwest end of Runway 11-29 that will be removed from service will not be torn out. Design of the runway/taxiway extensions and related actions would be in accordance with Federal Aviation Administration (FAA) specifications.

The FAA has been a cooperating agency throughout the EIS process and intends to issue a separate ROD for modifications at the Lafayette Regional Airport that are required as a part of the I-49 Connector highway project. Therefore, the separate FAA ROD is required prior to the construction of the I-49 Connector. The FAA ROD will address the following actions related to the airport:

The FAA may make a number of decisions pursuant to the Final EIS. Generally, the FAA's ROD will address the possible approval of a change to the Airport Layout Plan (ALP), upon request from the airport owner. These changes may include the depiction of actions necessary to accommodate the I-49 Connector project. Other decisions the FAA may make include the relocation of navigational aids, a change to approach procedures as required, and consideration of possible release of approximately 3.5 acres of Federally-obligated airport property, upon request by the airport property owner.

#### COMMITMENT

In order to construct the southeast extension for Runway 11-29, airspacing and obstruction evaluations will be performed before and during construction of the I-49 Connector. Special care will be taken by the contractor to see that the construction cranes do not extend above the glide slope. Only certain roadway lights can be used on the I-49 overpass at University/Surrey Streets. These lights will be pointed down and will be designed so as to not encroach into the glide slope or otherwise affect airport operations. The LaDOTD and FHWA will fund necessary airport modifications as a part of the highway project.

The FAA has conducted modeling obstacles, primarily large tractor-trailers, on the access road for possible impacts to the Very High Frequency Omnidirectional Range (VOR) radiated signal. The modeling indicates no impacts to the operation of the VOR; however if upon completion of the I-49 Connector project, an impact on the VOR is identified, LaDOTD/FHWA commits to funding the relocation of the VOR.

The FAA has an active project to replace the Runway 22L localized antenna array in essentially the same location in the future. The I-49 Connector project will not require any additional right-of-way in the vicinity of the existing or the future relocated localizer antenna array. Therefore, no impact on the FAA's plans should occur.

In order to minimize impacts to the Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR), for Runway 04R, that will be in place prior to commencement of design of the I-49 Connector project, the LaDOTD/FHWA agrees to coordinate with the FAA on any

preliminary design in the area between nodes A and B depicted in Volume I of the Final EIS, Exhibit S-2.

During the design phase of the project, the LaDOTD and FHWA will coordinate with the Federal Aviation Administration (FAA) Fort Worth NAS Implementation Center, ANI-600, (817-222-4500) to ensure that FAA technical specifications are met with regard to navigational aids.

The I-49 Connector overpass at University Avenue and the I-49 Connector interchange at Kaliste Saloom Road would penetrate a 100:1 slope off any runway. As a result, a FAA Form Alteration, will be filed with the Air Traffic Division, ASW-520, before construction.

### **3.11 Wetlands**

The Final EIS states that five acres of wetlands will be adversely impacted by the Selected Alternative. This is due to the 350' extension of Runway 11-29 and 200' overrun area under the Selected Alternative that will encroach on an area considered jurisdictional wetlands subject to Section 404 (b) of the Clean Water Act of 1977, based on evidence gathered during field inspection of the aforementioned area (wetland site W-2). Based on the consideration discussed in the Final EIS in compliance with the requirements of Executive Order 11990, it has been determined that there is no practicable alternative to the proposed construction in wetlands and that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.

The runway extension would also encroach into a floodplain fringe area (but not the main floodway). Due to the small area affected, no appreciable increase in flood heights will occur.

#### **COMMITMENT**

The LaDOTD will minimize the area of wetlands to be affected for the required Lafayette Regional Airport runway extension, by utilizing design features that avoid the need to relocate Bayou Tortue. This will include embankment stabilization with riprap or other means.

#### **MITIGATION**

Approximately five acres of wetlands would be adversely impacted by the project. Potential methods of mitigation for wetland impacts include restoration, creation, or mitigation banking that would provide off-site locations for this mitigation. During the Section 404 permitting process, if it were determined appropriate, LaDOTD will implement mitigation by one of the above methods.

### **3.12 Vermilion River**

Impacts to the water quality of the Vermilion River associated with the proposed project would be similar for all alternatives considered in the Final EIS including the Selected Alternative. It is not expected that impacts of the proposed project would be noticeably greater than impacts currently attributable to the existing Thruway.

#### **COMMITMENT**

Design of the river crossing will be conducted so as to not restrict the flow of the Vermilion River for the 100 year flood.

Temporary erosion control procedures to control sediment-laden runoff from unstable construction embankments will be employed to minimize impacts to the Vermilion River during the construction phase of the project.

### **3.13 Parks (Section 4(f) and 6(f) Properties)**

Based on the anticipated impacts to parks due to the project as discussed in the Final EIS, it has been determined that Section 4(f) and 6(f) would not be applicable with regard to parks in the vicinity of the project. Although noise and visual effects will occur at Beaver Park, they do not substantially impact the 4(f) property. Should design details as subsequently developed cause impacts which are not currently apparent, 4(f) and 6(f) applicability would be reviewed by the FHWA and LaDOTD and statements prepared, if warranted.

#### **COMMITMENT**

LaDOTD will coordinate with the National Park Service and Lafayette Parish Recreation and Parks during the design phase to ensure that appropriate access and egress opportunities are maintained at Jean Lafitte National Historic Park and Beaver Park during construction and after completion of the project. It is not known at this time when the detailed design will commence.

### **3.14 Live Oak Trees**

As part of the EIS process, a study has been conducted by a licensed arborist to evaluate the existing conditions of three live oak trees located along the proposed alignments and the affects the construction of the Selected Alternative may have on the trees. Two Live Oak trees near the Sterling Grove Historic District and one tree near the Castille and existing Evangeline Thruway intersection were analyzed in the arborist's study.

The study indicates that no negative impacts are expected to occur on the two trees near the Sterling Grove Historic District because the existing Evangeline Thruway is being relocated away from the trees, thus providing more green space within the drip line of the trees. It is expected that any of the alternatives of the proposed project including the Selected Alternative ultimately would benefit the two trees.

The Live Oak tree (Live Oak Tree No. 103) located in the median between the north and southbound lanes of Evangeline Thruway near its intersection with Castille Street is considered a heritage tree, as it is over one hundred years old, and is in good to excellent condition. The design team has developed a modified design concept of the locally preferred alternative as presented in the Final EIS (Subalternative H) in order to provide an opportunity for the I-49 project to avoid this tree. A summary of the arborist's report is provided in the Final EIS.

#### COMMITMENT

The three Live Oak Trees studied during this EIS process will remain in place, including Live Oak Tree No. 103 located in the median near I-10 and Willow Street. Due to the close proximity of this tree to the proposed I-49 Connector freeway, LaDOTD will consider a design for the mainline and ramps near the tree to avoid and minimize secondary impacts. (See items 1 and 2 below.) In addition, LaDOTD will:

- Develop tree protection plans and specifications designed by an ISA certified arborist and a registered landscape architect,
- Provide for site supervision and construction observation by ISA certified consulting arborist, and
- Provide for post construction tree survey and damage assessment.

LaDOTD will implement design and construction techniques to minimize impacts to the root zone of Live Oak Tree No. 103. Considerations to provide additional space and visual quality for Tree No. 103 may be provided by:

1. Reversing the locations of the re-aligned Evangeline Thruway and the proposed northbound entrance ramp so that the entrance ramp is to the east of Evangeline Thruway. This would provide unobstructed views of the tree from the ground level northbound Evangeline Thruway.
2. Shifting the I-49 mainline structures approximately 20-25 feet to the west. However, this may require additional right-of-way on the west side of the Evangeline Thruway southbound lanes.

### **3.15 Construction Debris**

The amount of construction debris associated with the proposed project during the construction phase would be similar for all alternatives considered including the Selected Alternative. Appropriate measures will be made to ensure that the debris is removed from the project area and discarded properly.

#### **COMMITMENT**

The removal and disposal of construction related materials will occur under the construction phase of the project and it will be the responsibility of the contractor to adhere to all applicable state and federal regulatory requirements and LaDOTD specifications.

### **3.16 Destination Signing and Traffic Control Plans**

Each of the alternatives considered for the proposed project including the Selected Alternative will affect the access and egress to and from area destinations. Each of the alternatives including the Selected Alternative will also have the potential to affect the traffic flow in the area during the construction phase of the project.

#### **COMMITMENT**

Detailed directional signing for the I-49 Connector project will be developed in compliance with Manual for Uniform Traffic Control Devices (MUTCD) and LaDOTD policy during the design phase of the project. This will include temporary detours during construction if these are needed.

Signage identifying access into the central business district (CBD) will be provided in accordance with the MUTCD and LaDOTD policy.

LaDOTD will coordinate with the National Park Service and Lafayette Parish Recreation and Parks during the design phase to ensure that appropriate access and egress opportunities are maintained including signage in accordance with the MUTCD and LaDOTD policy, at Jean Lafitte National Historic Park and Beaver Park during construction and after completion of the project. It is not known at this time when the detailed design will commence.

### **3.17 Local Access and Circulation**

Local access and circulation in the central core area of the project is important with regard to area neighborhoods, businesses, and the central business district (CBD). The Selected Alternative includes design features that maintain existing circulation patterns and provide improved access to the CBD. These features of the Selected Alternative were developed through various meetings and workshops to gather community and local agency input.

Other initiatives were taken with regard to access and circulation concerns of the Sterling Grove Historic District.

#### **COMMITMENT**

The following streets will remain open for local access and circulation under the proposed project:

- Kaliste Saloom
- University/Surrey
- Pinhook (U.S. 90 BUS)
- Taft
- Johnston (U.S. 167)
- Jefferson
- 3<sup>rd</sup>
- 2<sup>nd</sup>
- Simcoe
- Mudd (U.S. 90)
- Donlon
- Willow
- Castille

The Selected Alternative has identified an opportunity to keep Greig Street open under the freeway. This will be studied more closely in the Joint Use Development Plan.

### **3.18 Community Impacts and Cohesion**

Each of the alternatives including the Selected Alternative has the potential to impact the community and cohesion.

#### **COMMITMENT**

A Joint Use Development Plan will be implemented to minimize community impacts. See Section 3.21 of this ROD (*Joint Use Development Plan*).

FHWA and LaDOTD will ensure that design plans for the proposed project provide vehicular and pedestrian access across the I-49 Connector. The streets that will remain open for vehicular traffic are listed in Section 3.17 of this ROD (*Local Access and Circulation*). Pedestrian circulation patterns will be developed during the Joint Use Development Plan.

During the design of the proposed project, LaDOTD will provide the provision of increasing the elevation of the roadway structure above the minimum requirement in order to increase the feeling of openness under the structure and to keep cohesion within the community.

Special considerations will be made during the design of the proposed project for aesthetically enhancing the appearance of the structure piles and bents.

### **3.19 Corridor Preservation**

The Lafayette Consolidated Government (LCG) Corridor Preservation and Management Action Plan for the I-49 Alignment has been developed and adopted as a part of the Joint Cooperative Endeavor Agreement (JCEA) amongst the LaDOTD, FHWA, and LCG. Under the Plan, rights of way for the Selected Alternative will be acquired over time, as funding becomes available. The Corridor Preservation and Management Action Plan discusses both mitigation and enhancement items to be implemented as part of the LCG overall plan. Many of these items will be eligible for state and federal funding. The plan also includes economic development and redevelopment strategies in the corridor. A joint use plan throughout the corridor is also discussed within the Corridor Preservation and Management Action Plan to facilitate the incorporation of these provisions into the project during the design and construction phases. Some of these provisions will be funded by the FHWA and LaDOTD while some items may be funded by the LCG.

#### **COMMITMENT**

As agreed to in the Joint Cooperative Endeavor Agreement contained in Appendix G of the Final EIS, LaDOTD in cooperation with FHWA and Lafayette Metropolitan Planning Organization (MPO) will apply the provisions of the Lafayette Consolidated Government (LCG) Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment. As mentioned in Section 3.1 of this ROD (*Displacements*) the plan states provisions regarding right-of-way acquisition, relocation assistance, and last resort housing.

Due to the lack of initial funding, the project will be implemented in stages.

The first stage will be the LCG Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment. As funding becomes available, Stage 2 (design) will then begin followed by Stage 3 (construction).

### **3.20 Facility Construction**

All the alternatives considered for the proposed project, including the Selected Alternative, have the potential to affect traffic operations, create noise, and produce construction debris.

#### **COMMITMENT**

Special care will be taken to minimize the negative impacts to vehicular and pedestrian traffic flow through the corridor through the use of detailed signing plans and construction techniques during the facility construction phase.

See Section 3.5 of this ROD (*Noise*) for more specific information regarding the commitments concerning construction noise.

The removal and disposal of construction related materials will occur under the construction phase of the project and it will be the responsibility of the contractor to adhere to all applicable state and federal regulatory requirements and LaDOTD specifications.

### **3.21 Joint Use Development Plan**

All project alternatives, including the Selected Alternative, have been considered with regard to the opportunity to minimize impacts to the community.

#### **COMMITMENT**

In conjunction with the project design process, the LaDOTD will prepare a Joint Use Development Plan for the length of the project corridor after this ROD has been signed. In addition to landscaping (which includes "hardscape" provisions, pedestrian access, bicycle paths, and under-deck lighting), this plan will incorporate additional features to be determined in part by local agency and public input. Elements from the Section 106 mitigation plan, prepared in accordance with the signed MOA to mitigate adverse impacts to Sterling Grove Historic District, will be incorporated into the overall Joint Use Development Plan as appropriate. Refer to Section 3.3 of this ROD (*Sterling Grove Historic District*) for more detailed information on provisions agreed upon for the Section 106 mitigation plan.

## 4. SECTION 106 COMPLIANCE

A Section 106 Study (as referred to in 36 CFR 800.9) for properties listed on or eligible for inclusion on the National Register of Historic Places (NRHP) was conducted for the proposed project in the study corridor. The findings of the Section 106 study were reported in the I-49 Connector Section 106 Adverse Effect Documentation Report and the Final EIS.

The LaDOTD has determined that the I-49 Connector Project will have an adverse visual effect upon the Sterling Grove Historic District, a district included on the National Register of Historic Places, and LaDOTD has consulted with the Louisiana State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f).

The LaDOTD, the Federal Highway Administration (FHWA), the Advisory Council on Historic Preservation, and the Louisiana SHPO have agreed that the I-49 Connector Project will be implemented in accordance with stipulations to take into account the visual effects of the proposed project on the Sterling Grove Historic District and the potential effects to archaeologically significant properties. This agreement and the corresponding stipulations have been formalized in a Memorandum of Agreement (MOA) that was approved by all parties. In addition, three MPO committees and the Lafayette City-Parish Planning Commission were concurring parties for the document. The MOA in its entirety is contained in Appendix F of the Final EIS.

Section 4(f) has been determined to be not applicable because there is no taking or constructive use from the historic district or other applicable properties.

## 5. MONITORING AND REPORTING

In order to monitor and report the project's activities associated with the commitments and mitigation measures discussed in the MOA, the Joint Cooperative Endeavor Agreement, the Final EIS, and this ROD, the LaDOTD will create and maintain an Information Management System (IMS).

## 6. COMMENTS ON THE FINAL EIS

This portion of the ROD includes comments received by the LaDOTD on the Final EIS for the I-49 Connector Project. The Final EIS was approved by the FHWA on August 30, 2002. A Notice of Availability requesting comments on the Final EIS was published in the Federal Register on September 13, 2002 with a comment due date of October 15, 2002. This date was extended to November 1, 2002, to account for hardships that may have been caused by Hurricanes Isidore and Lili that struck during the response period.

Comments on the Final EIS were received from federal, state, and local agencies, private organizations, elected officials, businesses and local residents. To a great extent, these comments reflect issues previously raised on the Draft EIS.

Six hundred and seventy-four (674) letters from agencies, organizations, and individuals and one petition with over 2000 signatures were received by LaDOTD and FHWA. The majority of comments received were related to specific requests for a public hearing and a lengthened comment period and concerns about cultural resources, hurricane evacuation, and hazardous waste contamination. In addition, numerous comments were received expressing opposition to the I-49 Connector route through the city (which includes all alternatives considered in the EIS) and requesting that a loop around the city be investigated more fully.

LaDOTD and FHWA have carefully reviewed all comments received on the Final EIS and it has been determined that the substantive environmental issues raised in the comments have been fully responded to. FHWA has considered all Final EIS comments in reaching the decisions documented in this ROD.

The comments have been summarized in a table that lists the comment number, commentor, the comment date, subject code, the issue noted in the comment, and (where applicable) a response to the comment. The table is provided in Appendix A and the actual comment letters are on file at LaDOTD and FHWA offices in Baton Rouge, Louisiana. The list of subject codes used to identify each type of comment is provided in Appendix A of this ROD and also on each page of the Summary Table. Each comment is numbered sequentially, with a binomial code. The first number in the code classifies the comment into one of the following seven categories:

- 1) Federal Agencies
- 2) State Agencies
- 3) Regional or Local Agencies
- 4) Private Organizations or Groups
- 5) Public Services (Including Elected Officials)
- 6) Corporations/Businesses
- 7) Other Interested Persons

The second number in the binomial code is the number assigned to each comment within each category as it was received.

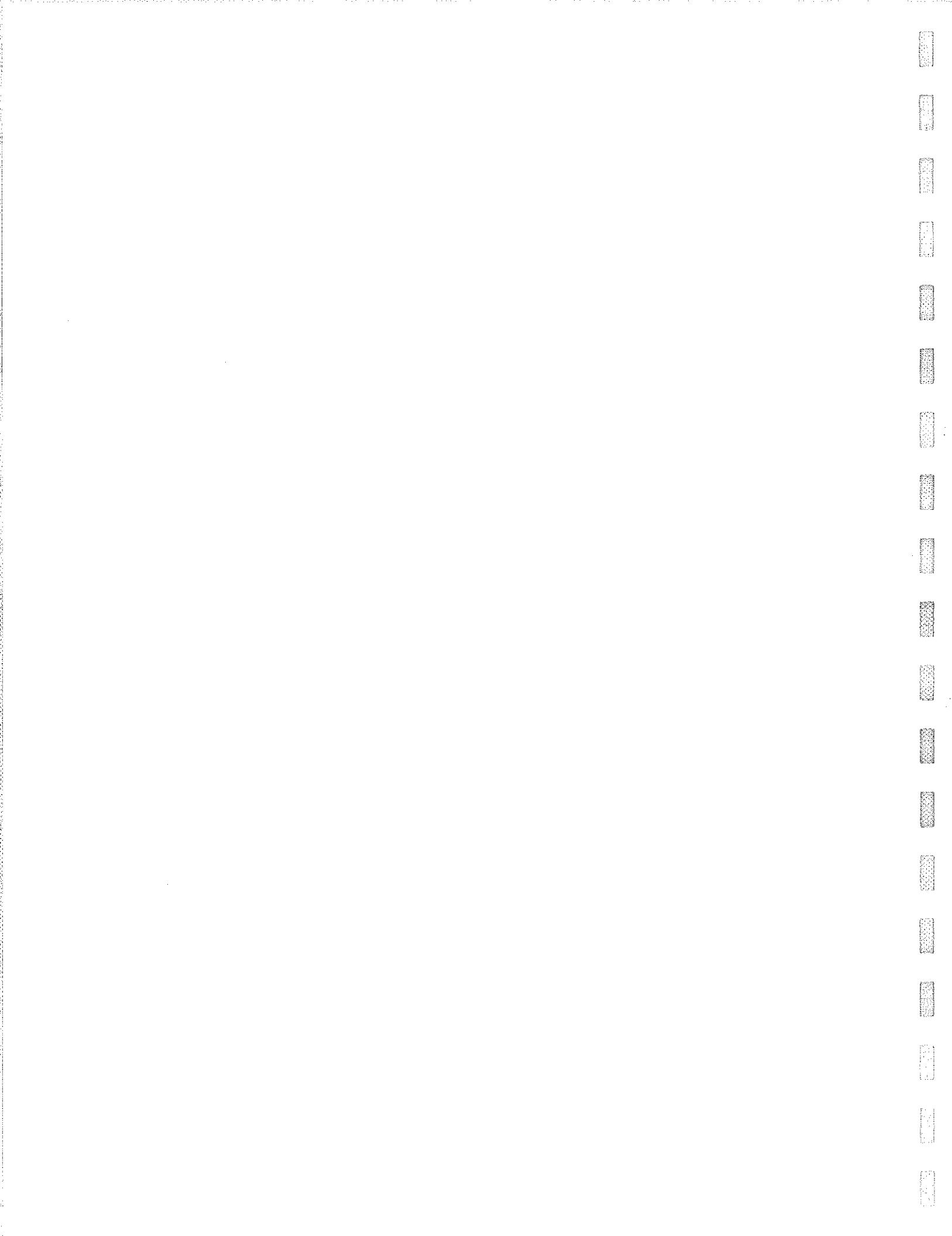
## 7. RECORD OF DECISION APPROVAL

Based on the analysis and evaluation contained in the proposed project's Final Environmental Impact Statement; after careful consideration of all the identified social, economic, and environmental factors and input received from other agencies, organizations, and the public; and the factors and project commitments and mitigation measures outlined above, it is the decision of the FHWA to approve the selection of the RR-4 Elevated Alignment with the MPO Subalternative and Subalternative H as the Selected Alternative for the I-49 Connector project.

1/8/03  
Date



William A. Sussmann  
Louisiana Division Administrator  
Federal Highway Administration



## APPENDIX A

I-49 Connector Final EIS  
Summary of Comments and Responses



**List of Subject Codes for  
I-49 Connector Final EIS Summary of Comments and Responses**

<b>Subject Code</b>	<b>Subject</b>
AL	Alternatives
AQ	Air Quality
BIO	Biological Resources
CON	Construction Impacts
CH	Cultural/Historic
CIR	Circulation/Traffic
C/N	CEQA/NEPA Issues
CP	Corridor Preservation
CUM	Cumulative Impacts
EE	Emergency Evacuation
ED	Economic Development
FN	Funding
HE	Human Environment
HW	Hazardous Waste/Materials
LRA	Lafayette Regional Airport
LU	Land Use
MM	Mitigation Monitoring
NOI	Noise
NEI	Not EIS Issue
NR	No Response
OP	Opinion
PD	Project Description
PS	Public Services
PN	Purpose and Need
RD	Request for Data
RB	Residential/Business Relocation
TR	Transit
WE	Wetlands
WR	Water Resources
4F	Section 4(f)
106	Section 106



## I-49 Connector Final EIS

### Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
1-1	U.S. Army Corps of Engineers	9/19/02	WE	<p>a. States that it is not anticipated that any adverse impacts will occur to any Corps of Engineers projects.</p>	Comment noted.
			WE	<p>b. Wetlands subject to Corps of Engineers regulatory jurisdiction occur within the project area. A Department of the Army permit under Section 404 of the Clean Water Act will be required for the project.</p>	As noted in the FEIS (Section 4.4.3) a Section 404 permit will be required from the Corps of Engineers for the proposed project. Action will be taken at the appropriate time to obtain the permit.
1-2	U.S. Coast Guard	9/23/02	WR	<p>a. As indicated in previous correspondences, the Vermilion River, above mile 51, has been determined to be a non-navigable waterway of the U.S. and not subject to Coast Guard jurisdiction for bridge permitting purposes. As a result, no Coast Guard bridge permit will be required for the project.</p>	Comment noted.
			WR	<p>b. Plans for the proposed bridge should provide adequate clearances to accommodate occasional recreational boating and flooding which may exist in the area.</p>	During the design phase, adequate vertical clearance will be provided for the Vermilion River.
			WR	<p>c. Suggests that the Federal Emergency Management Agency and local floodplain administrator be contacted to obtain any permits they require and to formulate any mitigation measures that may be necessary.</p>	Comment noted and will be done.
			WR	<p>d. After the bridge is constructed, its maintenance will remain the responsibility of the owner.</p>	Comment noted.
	CON, WR			<p>e. Should construction not be commenced within 2 years and completed within 5 years from the date of this letter, it is required that the project reapply for Coast Guard approval.</p>	The Coast Guard will be contacted during project development.

\*The first number in the comment number classifies the comment into one of the following categories: 1) Federal Agencies, 2) State Agencies, 3) Regional or Local Agencies, 4) Private Organizations or Groups, 5) Public Services, 6) Corporations/Businesses, 7) Other Interested Persons. The second number is an arbitrary number assigned to each comment within a category.

\*\*Subject codes referred in the table for each comment are as follows: AL=Alternatives; AQ=Air Quality; BIO=Biological Resources; CON=Construction Impacts; CH=Cultural/Historic; CIR=Circulation/Traffic; CN=CEQA/NRPA Issues; CP=Corridor Preservation; CUM=Cumulative Impacts; EE=Emergency Evacuation Route; ED=Economic Development; FN=Funding; HE=Human Environment; HW=Hazardous Waste/Materials; LRA=Lafayette Regional Airport; LU=Land Use; MM=Mitigation Monitoring; NOI=Noise; NR=No Response; OP=Opinion; PN=Purpose & Need; RD=Request for Data; RB=Residential/Business Relocation; TR=Transit; WE=Water Resources; WR=Wetlands; WE=Transit; WE=Relocation.

# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
2-1	LA Dept. of Environmental Quality (LaDEQ)	10/09/02	WE, WR, HW, CON WE	<ul style="list-style-type: none"> <li>a. Based on in-house review of the FEIS, there is no objection to the implementation of the proposed project, provided that the issues listed below are satisfied if required:           <ul style="list-style-type: none"> <li>• If any of the proposed work is located in the wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, the Corps should be contacted in order to apply for necessary permits;</li> <li>• If a permit is required from the Corps, a Water Quality Certification from the LaDEQ Office of Environmental Services may also be required;</li> <li>• All precautions should be observed to protect the groundwater of the region;</li> <li>• All precautions should be observed to control nonpoint source pollution from construction activities; and</li> <li>• LaDEQ has a stormwater general permit for construction areas equal to or greater than five acres. It is recommended that the DOTD contact Jan Cedars at 225-765-2784 to determine if the proposed improvements are covered under the general permit.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Comment noted. LaDEQ will continue to be consulted regarding the air and water quality within the corridor as the project progresses to design and construction.</li> <li>See Comment No. 1-1.</li> <li>LaDEQ will be notified of the permit required by the Corps and actions will be taken at the appropriate time to obtain a Water Quality Certification from LaDEQ if needed.</li> <li>Comment noted. See response to Comment No. 4-5 (pp).</li> <li>Comment noted. Normal procedures will be followed.</li> <li>Comment noted and will be done.</li> </ul>

\*The first number in the comment number classifies the comment into one of the following categories: 1) Federal Agencies, 2) State Agencies, 3) Regional or Local Agencies, 4) Private Organizations or Groups, 5) Public Services, 6) Corporations/Businesses, 7) Other Interested Persons. The second number is an arbitrary number assigned to each comment within a category.

\*\*Subject codes referenced in the table for each comment are as follows: AL=Alternatives; AQ=Air Quality; BIO=Biological Resources; CON=Construction Impacts; CH=Cultural/Historic; CIR=Circulation/Traffic; C/N= CEQA/NEPA Issues; CP=Corridor Preservation; CUM=Cumulative Impacts; EE=Emergency Evacuation Route; ED=Economic Development; FN=Funding; HE=Human Environment; HW=Hazardous Waste/Materials; LRA=Lafayette Regional Airport; LU=Land Use; MM=Mitigation Monitoring; NOI=Noise; NR=No Response; OP=Opinion; PN=Purpose & Need; RD=Request for Data; RB=Request for Data; WE=Water Resources; WR=Wetlands; TR=Transit; WE=Residential/Business Relocation; 4(f)=Section 4(f); 106=Section 106 Documentation.

## I-49 Connector Final EIS

### Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				project will cause or contribute to violations of the 8-hour CO NAAQS.	
	AQ		c.	Regarding the conformity implications discussed in the FEIS, statements concerning the limited maintenance status of Lafayette Parish are accurate and valid as of this date.	Comment noted.
	AQ, LRA		d.	Regarding concerns about the required runway modifications at the Lafayette Regional Airport, LaDEQ is reasonably confident that this part of the overall action will have no significant impact on the regional air quality of Lafayette Parish nor jeopardize its current attainment status.	Comment noted.
2-2	LA Dept. of Agriculture & Forestry	9/20/02	NR	No comment.	No response.
2-3	LaDOTD Floodplain Management	10/23/02	WR	a. States that the majority of the project is located in a No Special Flood Hazard Area. The only part that appears to be in a Special Flood Hazard Area is over the Vermillion River. Requirements regarding base flood elevations are not applicable in a No Special Flood Hazard Area, but are applicable in a Special Flood Hazard Area. During and after construction, attention should be paid to clearing debris and keeping the project area open to allow for accumulation and flow of water.  b. Requests that all applicable state, federal, and local permits are obtained. Also, requests that the floodplain administrator, Charlene Picard (337-291-8468), be	Comment noted.
					Comment noted.

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				contacted to assure that compliance with parish requirements is met and appropriate permits are obtained.	
	WR		c.	The following comments were also received regarding compliance for floodplains:	See responses following:
				<ul style="list-style-type: none"> <li>• Page S-14 – States that the FEIS reports that the proposed extension of the Lafayette runway in the floodplain of Bayou Tortue caused by Alternates EA-1 and RR-4 will be small. Questions that no formal calculations were provided</li> </ul>	<ul style="list-style-type: none"> <li>• Section 4.3.b.1 of the FEIS provides calculations regarding the encroachment into the floodplain. These calculations indicate that the Bayou Tortue Swamp is approximately 6400 acres that acts as a reservoir for Vermilion River and Bayou Tortue floods (U.S. Army Corps of Engineers, Renaissance Report, 1995). The runway fill area would lie in the floodplain fringe and would not affect the main floodway. The five acres of proposed fill in the floodplain would represent less than 1/10<sup>th</sup> of 1% of the reservoir area. On this basis it has been concluded that there would be no appreciable increase in flood levels in the floodplain.</li> </ul> <p>Other alternatives were identified that avoided the five acres in question but which caused other more measurable impacts, including residential displacements, business displacements, and bisecting of neighborhoods, primarily. During the detailed design phase appropriate design alternatives will be identified and one selected that minimizes impacts to the floodplain/wetlands.</p> <ul style="list-style-type: none"> <li>• Only those alternatives or features that may create substantial differences in flood elevations and limits should be evaluated; otherwise, the</li> </ul>

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				<p>conforms to the floodplain protection standards. Questions how this is accomplished and how the project complies.</p>	<p>document only requires a statement indicating that the drainage features will be developed in accordance with the Department's drainage standards and procedures, and that the impacts to floodplains will be minimal. This is done in Section 4.3.1.b. It is clear throughout the document that the RR-4 alternative is elevated across the Vermilion River floodplain although the runway extension will be in the Bayou Tortue floodplain (5 acres). See 1<sup>st</sup> bullet above.</p> <ul style="list-style-type: none"> <li>• Regarding the Vermilion River, the FEIS addresses on Page 4-89 that “Any reconstruction [of the existing river crossing] or new construction undertaken as a part of the Connector project would be in accordance with federal regulations, with no adverse impacts to the floodplain . . .” On Page 4-90 the FEIS states that “Bridge crossings of the Vermilion River would be designed to allow passage of the 100-year flood established by the Federal Emergency Management Agency (FEMA). In Table S-2, Item 12, the commitment is made to design the river crossing so as to not restrict the flow of the Vermilion River for the 100-year flood. The exact limits of the floodplain and bridging details will be determined during detailed design.</li> </ul>
WR				<p>Page 4-89 – States that the FEIS gives an account that the project does not impact the Vermilion River Floodplain, Bayou Tortue, and Coulee Bend. States that all alignments cross the Vermilion Floodplain and EA-1 and RR-4 intrude into the floodplain of Bayou Tortue as well. Suggests that to satisfy requirements for the Vermilion Floodplain for all alternatives, the entire width of the floodplain be bridged with minimal supports. Suggests that to satisfy the rise requirement for Bayou Tortue would be to extend the runway by bridging. Since there is no construction in the Coulee Bend Floodplain, it is not possible to know the project's impact if any.</p>	<p>Regarding Bayou Tortue, Refer to response given in 1<sup>st</sup> bullet above. The calculations as noted were prepared by registered professional engineers and are considered to be appropriate for the current phase of the project. Additional hydraulic and</p>

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WR				<ul style="list-style-type: none"> <li>Chapter 4 – States that no discussion exists within the section about the possibility of creating a new floodplain because of this new construction. Questions what calculations will be provided that show that large sections of Lafayette will be changed and carved up.</li> </ul>	<p>hydrologic calculations and runway design alternatives will be identified and could be employed during the detailed design phase.</p> <ul style="list-style-type: none"> <li>Reference is made to Page 4-89, Section 4.3.1.b Drainage and Hydraulics, which provides a discussion of the projects relationship relative to floodplain areas in the Lafayette region. “The Connector would not be directly longitudinally adjacent to any floodplain and therefore would not be expected to promote any incompatible floodplain development. The majority of floodplain (other than the marsh areas east of the city) in Lafayette Parish occurs well away from the project corridor. The primary service areas of the proposed Connector freeway are not in a floodplain; they have been and are expected to continue to experience development.</li> </ul>
WR				<ul style="list-style-type: none"> <li>Appendix A, Plate 2a – EA-1 and RR-4 alternatives fill and restrict the Vermilion Floodplain as shown on the profile. The proposed bridge over the Vermilion River protrudes into the floodplain about 750' on the southern side of the river.</li> </ul>	<ul style="list-style-type: none"> <li>The drawings presented are suitable for level of detail of the FEIS studies. During detailed design, the limits of the floodplain will be precisely determined and measures taken to avoid encroachment. See Table S-2, Item 12 commitment.</li> </ul>
WR				<ul style="list-style-type: none"> <li>Appendix B – Questions why floodplain data is not provided in this section.</li> </ul>	<ul style="list-style-type: none"> <li>Floodplain data is provided in Section 3.3.1.b, Exhibit 3-17, and Section 4.3.1.b . The Summary Chapter also provides discussion regarding</li> </ul>

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
3-1	Lafayette Consolidated Government - City-Parish Pres.	10/08/02	OP	<ul style="list-style-type: none"> <li>a. States that ample public meetings and hearings have been held for the project. The people have spoken and their elected representatives on the consolidated council have voted in favor of the important project.</li> <li>b. States that the Lafayette community, as well as congressional delegation, the governor and his I-49 Task Force, support the I-49 Connector and urges that the Record of Decision be approved at the earliest possible time in order to minimize delays. Stresses that the project is a local, regional, and national initiative.</li> </ul>	Comment noted.
3-2	City of Jeanerette - Mayor	09/09/02	RD	<ul style="list-style-type: none"> <li>a. Requests that a public hearing be held for the FEIS and an extension be given for the public comment period.</li> </ul>	According to FHWA regulations and procedures established by the National Environmental Protection Act (NEPA), for EIS's public hearings are held between the release of the Draft and the Final documents. The I-49 Connector DEIS Public Hearing was held in Lafayette on December 14, 2000, following the publication of the DEIS. The public could make comments at the meeting or send written comments to LaDOTD. These comments have been considered and documented along with responses in the FEIS (Table 5-1). As stated in Title 23, Code of Federal Regulations, Section §771.127, following the preparation of the FEIS, FHWA may proceed to a ROD no sooner than 30 days after publication of the ROD.

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
3-3	Greater Lafayette Chamber of Commerce, Inc. Pres. & CEO	09/25/02	ED	<ul style="list-style-type: none"> <li>a. Emphasizes that the Lafayette community has spoken and consistently supports the I-49 Connector.</li> </ul>	Final EIS notice in the FEDERAL REGISTER or 90 days after publication of a notice for the Draft EIS, whichever is later. This ROD falls within these guidelines.
			ED	<ul style="list-style-type: none"> <li>b. Supports the I-49 Connector because it will allow the city to grow as a retail, energy, legal, healthcare, entertainment, education, and transportation center for southwest Louisiana. States that by developing the infrastructure the area will reap the most benefit in terms of jobs.</li> </ul>	FHWA initially provided the public 30 days (until October 15, 2002) to submit written comments on the FEIS following its release. Due to inconveniences caused by a hurricane in the area during that time and in response to public request, the comment period was extended to November 1, 2002. This has given the public ample time to review the document and respond according to NEPA guidelines.
			EE	<ul style="list-style-type: none"> <li>c. States that the proposed project is also needed to improve safety and hurricane evacuation.</li> </ul>	Comment noted.
					Comment noted.

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
3-4	City of Lorraine Mayor	10/28/02	AL	a. Requests that the Teche Ridge alternate route be researched before making a decision on the I-49 route.	<p>East and west bypasses (loops) have been considered by the Lafayette Metropolitan Planning Organization (MPO) and rejected in prior studies because only the central corridor route was found to meet a primary purpose and need of the project to relieve the existing and projected increased traffic congestion in the Evangeline Thruway corridor. Therefore, the bypass alignments were not considered in the range of alternatives for the I-49 Connector EIS. An east or west bypass to complement the I-49 Connector located in the central corridor may be considered through the planning process of the Lafayette MPO in the future.</p> <p>In December 2002, current trip origin and destination data as maintained by the Lafayette MPO based on the 2000 census was consulted regarding local and through trips on the existing Evangeline Thruway. This data shows that only approximately 9% of the trips on the existing Evangeline Thruway have both origins and destinations outside of the Lafayette area (9% through traffic). 91% of the traffic on the existing Evangeline Thruway has an origin, a destination, or both in Lafayette Parish (91% local traffic). This current data supports the original conclusion that a bypass route would not serve a primary purpose and need of providing traffic relief in the Evangeline Thruway central corridor.</p>

Refer to Appendix B of the ROD for additional information.

- AL      b. States it would be safer and less expensive for I-49 to follow the Bayou Teche through rural St. Martin Parish.

A Teche Ridge alignment does not meet the purpose and need for the project to provide traffic relief in the Evangeline Thruway corridor and to connect Lafayette

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
3-5	Lafayette Downtown Development Authority, Exec. Dir.	10/31/02	AL	<ul style="list-style-type: none"> <li>a. Recommends that the MPO Subalternative be adopted and incorporated into the ROD.</li> <li>b. Expresses interest in the design process of the project and requests that the Downtown Development Authority provide input as the project continues with particular emphasis on access, physical development factors and design amenities, and noise abatement.</li> </ul>	<p>Comment noted and will be included in the ROD</p> <p>Comment noted and will be done through the joint use studies.</p>
3-6	Lafayette Airport Commission (LAC) Dir. Of Aviation	10/21/02	OP, PN	<ul style="list-style-type: none"> <li>a. States that the LAC is a strong supporter of the project and states it is a needed improvement that enhances safety, provides a much needed hurricane evacuation route, and will facilitate economic growth.</li> <li>b. Acknowledges that the Lafayette Regional Airport will be impacted by any of the proposed design alternatives but states that the project proposal provides for the needs of the airport. Requests that any required changes to the runway length be accommodated and consideration for acreage taken for right-of-way.</li> </ul>	<p>Comment noted.</p> <p>Comment noted.</p>
	LRA			<ul style="list-style-type: none"> <li>c. Also notes the following comments regarding the FEIS:           <ul style="list-style-type: none"> <li>• Pg. 4-74 – The word “shortened” should not be used. The correct term is “displaced threshold.”</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted.</li> <li>• Comment noted.</li> </ul>
	LRA			<ul style="list-style-type: none"> <li>• Pg. 4-76 – It is requested that any change to the Airport Layout Plan (ALP) be included as part of the I-49 Connector project and be accomplished as soon as possible.</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted. Coordination with the Lafayette Regional Airport of any potential ALP modifications deemed appropriate by FHWIA/LaDOTD and FAA will be made in the</li> </ul>

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RB				<ul style="list-style-type: none"> <li>Section 4.2.12.c – This section discusses the acquisitions of approximately 3.5 acres impacted by the project. Any roads within the property acquired should be relocated to provide access to remaining property. These 3.5 acres should be replaced with any land adjacent to the property.</li> </ul>	<ul style="list-style-type: none"> <li>Relocations and right-of-way acquisition (including parking lots) at the airport will be handled in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments of 1987. The location of any land considered to replace the 3.5 acres will be at the discretion of the airport.</li> </ul>
WE				<ul style="list-style-type: none"> <li>Pg. S-14 – Any mitigation measures required for wetlands should be included in the project.</li> </ul>	<ul style="list-style-type: none"> <li>As discussed in the FEIS and noted in the response to Comment No. 1-1 a wetlands permit will be required from the Corps of Engineers for the project. Table S-2 from the FEIS (“Commitments and Mitigation Measures Determined from the EIS Process”), commits LaDOTD and FHWA to minimizing the area of wetlands affected by the project and also addresses potential methods for mitigating wetland impacts such as restoration, creation, or mitigation banking.</li> </ul>
4-1	Kelly Caldwell for Concerned Citizens Coalition & Sterling Grove National Historic District	09/09/02	RD	a. Requests that a public hearing be held for the FEIS and an extension be given for the public comment period.	See response to Comment No. 3-2.

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4-2	Kiwanis Club of Jeanerette Pres.	10/17/02	OP	a. Prefers that the I-49 Connector be built along Teche Ridge instead of through Lafayette's city limits.	See response to Comment No. 3-4.
4-3	Trees Acadiana, Vice Pres.	10/31/02	MM	a. Offers their support and expertise toward any planning exercise and/or discussion pertaining to planting and maintenance of any adjoining green space.	Comment noted and opportunity will be provided during the joint use studies.
4-4	J. Louis Gibbens for Sterling Grove Historic District	11/01/02	CH, 4F, MM	States that the FEIS fails to comply with Section 106 of the National Preservation Act and Section 4(f) of the Department of Transportation Act. The following issues were addressed in the comment:	Comment noted. See responses following.
				a. States that all proposed alternatives, including RR-4, will result in "actual use" of 4(f) properties. States that the 1977 Lafayette Parish study/inventory of historical sites should have been consulted for the DEIS or FEIS in order to identify 4(f) properties correctly.	As noted on Page C-201 of the FEIS Volume II, the FHWA in its May 25, 2001, response to a letter from the Department of the Interior dated April 30, 2001, determined that 4(f) is not applicable, as there will be no takings or constructive use of the Sterling Grove Historic District.
			4F		

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The DEIS/FEIS contains summary information relative to cultural resources. The 1977 study was extensively consulted, as were the results of the 1991 survey. Both are referenced in the 1999 Historic and Recommended Historic Properties within the I-49 Connector Study Corridor report (Exhibit E of Comment No. 4-5).					
				Copies of the pertinent portions of the 1977 study and corresponding 1991 survey forms were attached to the individual Louisiana Historic Resources Inventory forms submitted to the Louisiana State Historic Preservation Officer (SHPO) in 1999.	
				Also refer to responses to Comment Nos. 4-5 (cc) and (hh).	
4F				b. States that all the proposed alternatives will result in “constructive use” of 4(f) properties due to the impacts the project will have on the Sterling Grove Historic District. The commentor cites various projects in which 4(f) reviews were required for highways being built near historic sites.	See response above and response to Comment No. 4-5 (cc).
CH, MM	c.			States that the FEIS does not provide mitigation for the Sterling Grove Historic District and other resource properties. Does not feel the MOA adequately provides to mitigate the adverse visual effects of the Sterling Grove Historic District. Considers this a violation of Section 106 and invalidates the FEIS and should require a new and/or supplemental 106 review of the undertaking.	The intent of the MOA is to ensure that mitigative measures are carried out, such as “mitigating adverse visual impacts of the project that will occur at the Sterling Grove Historic District through the use of landscaping and other measures . . .” (FEIS Appendix F). It is not the intent of the MOA to provide specific plans for the mitigative measures. The MOA was approved by the SHPO, the Advisory Council on Historic Preservation (AChP), the FHWA, and the LaDOTD. The Lafayette Metropolitan Planning Organization (MPO) and the Lafayette City-Parish Planning Commission signed the document as

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# I-49 Connector Final EIS

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CH	d.	States the MOA is deficient because of the following:		Comment noted. See responses below.	concurring parties. Because the MOA is a legally binding document, the provisions listed within the document are required at a minimum by LaDOTD and FHWA.
				• The 1977 Lafayette Planning Commission's historical site inventory was not consulted in the Section 106 report and thus violates the NHPA enabling regulations.	• See response to Comment No. 4-4 (a).
				• The commentor states the MOA did not include the views of the public regarding mitigation.	• A public meeting/workshop was held on December 6, 2001, to specifically discuss methods for mitigating the visual effects of the proposed project on the Sterling Grove Historic District. A separate meeting was also held with the St. Genevieve Catholic Church and School, which is an important part of the Sterling Grove Historic District that is most immediately impacted. See responses to Comment Nos. 4-4 (c) and 4-5 (k).
4F	e.			States the FEIS should not have been signed by the regional administrator but should have been submitted to the Administrator's Headquarters for prior approval. The commentor states a letter from the Department of the Interior dated April 30, 2001, regarding the lack of a 4(f) review supports his reasoning on this issue.	See response to Comment No. 4-4 (a). Because Section 4(f) was not applicable, the FEIS document was handled at the FHWA Division level. The decision of non-applicability was made by FHWA at its Louisiana Division Office and written concurrence was provided by FHWA's Headquarters Office of NEPA Facilitation.

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4-5	Concerned Citizens Coalition of Lafayette  (31 Page Brief Plus Exhibits Prepared by Tulane Law Students)	10/31/02	C/N, CH, 4F, HW, NOI, CUM	<p><u>I. Introduction</u></p> <p>a. The brief states the opinion that, “The agencies have not complied with federal law, including the National Environmental Policy Act, the National Historic Preservation Act, and Section 4(f) of the Department of Transportation Act, and therefore must hold the project in abeyance until they have studied a full range of alternatives.”</p> <p><u>The Brief Claims Violation of National Historic Preservation Act</u></p> <p><b>NOTE:</b> Shaded cells represent section headings as contained in the brief. Each major comment under each section heading has been broken out and addressed.</p> <p>b. • States that agencies failed to make a good faith effort to identify all historic sites that will be affected by the project</p> <ul style="list-style-type: none"> <li>• States that agencies failed to identify and evaluate several historic sites</li> <li>• States that historic sites that were evaluated were not adequately evaluated</li> </ul> <p><u>The Brief Claims Violation of Section 4(f)</u></p> <p>c. • States that agencies failed to prepare a Section 4(f) Report</p> <ul style="list-style-type: none"> <li>• States that agencies failed to choose a “feasible and prudent alternative” to the proposed project that would have less negative impacts on Section 4(f) sites</li> </ul>	<p>Comment noted. Exceptions taken as described in responses following.</p> <p>Comment noted. See responses to Comment Nos. 4-4 (a) and 4-5 (k) through (v).</p> <p>Comment noted. See response to Comment No. 4-5 (w).</p> <p>Comment noted. See response to Comment No. 4-5 (x).</p> <p>Comment noted. See responses to Comment No. 4-5 (y) through (hh).</p> <p>Comment noted. See responses to Comment No. 4-5 (ii) through (jj).</p>

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				The Brief Claims the Agencies have not complied with the National Environmental Policy Act because the FEIS contains an inadequate range of alternatives and is improperly segmented.	
C/N, AL		d.		<ul style="list-style-type: none"> <li>• States that with respect to the alternatives, the agencies confined the range to a five-mile area and did not consider the Teche Ridge Alternative</li> <li>• States that the agencies violated NEPA by segmenting the I-49 Connector</li> <li>• States that if the scope of the FEIS is adequate, the agencies' examination of the environmental consequences is woefully inadequate.</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted. See responses to Comment Nos. 3-4 (a), 4-5 (kk) and 4-5 (ii).</li> <li>• Comment noted. See response to Comment No. 4-5 (oo).</li> <li>• Comment noted. Exceptions taken as described in responses following.</li> </ul>
NR		e.		The brief summarizes the study corridor for the proposed project and the alternatives that were presented in the FEIS, including the preferred alternative (RR-4 Elevated).	Comment noted.
AL		f.		<p><b>A. Background</b></p> <p><b>B. Teche Ridge Alternative</b></p> <ul style="list-style-type: none"> <li>f. The brief describes an alternate route, the Teche Ridge Alternative, proposed by the Concerned Citizens that bypasses Lafayette to the east through St. Mary Parish. Refers to the House Report to the Transportation Appropriations Bill now before the House of Representatives which directs the FHWA to formally study the Teche Ridge Alternative.</li> </ul>	<ul style="list-style-type: none"> <li>Comment noted.</li> </ul>
		g.		The brief states that the preference for the Teche Ridge Alternative stems from the illegality of the proposed	Comment noted. Exceptions taken as described in responses following.

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AI.				<p>h. The brief states that, "In 2001, St. Martin Parish retained T. Baker Smith Engineers of Houma, Louisiana to conduct a study of the Teche Ridge Alternative. Based on this study, Dr. Robert Gramling, the Director of the Center for Socioeconomic Research at the University of Louisiana at Lafayette, has determined that the proposed I-49 Connector would cost almost twice as much as the Teche Ridge Alternative and would take up to seven years longer to build.</p>	<p>Refer to the response to Comment No. 3-4 which indicates that the Teche Ridge alignment does not meet the purpose and need for the project.</p> <p>It is unknown how the cost estimate and construction time period estimates were derived in the St. Martin Parish study. Analysis by engineers at the LaDOTD and consulting firm of HNTB Corporation indicate that the 27 miles of Teche Ridge alignment would cost approximately \$601 million, excluding right-of-way acquisition and engineering design costs. When compared to the cost of the Evangeline Thruway corridor project between common end points (I-49 Connector Selected Alternative plus adjacent section south of I-49 Connector) it is seen that the Evangeline Thruway corridor alternative and the Teche Ridge alignment are relatively equal in cost. The Teche Ridge estimate also does not include additional costs that would be necessary to relieve existing traffic congestion on the existing Evangeline Thruway.</p> <p>Construction time is dependent on many factors such as the availability of funds and sequence of construction. Therefore, there is no basis at this time to state that one project would take less time to construct than the other. This is especially true given that the Teche Ridge alignment consists of 27 miles of roadway compared to 14 miles of roadway for the route through Lafayette and continuing south to reach a common end point.</p>

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		AL		<p>i. The brief states the Teche Ridge Route would do a better job of relieving traffic in Lafayette by routing more traffic around the city and also provide better hurricane evacuation because the proposed project would force hurricane evacuees to compete with Lafayette local traffic.</p>	<p>The Teche Ridge alignment does not meet purpose and need in that it would not attract existing traffic from the existing Evangeline Thruway and would not directly connect Lafayette to the existing interstate system. Additionally, only approximately 9% of the existing trips on the Evangeline Thruway are considered through traffic, having origins and destinations outside of the metropolitan area. These factors indicate that the Teche Ridge alignment would not adequately relieve existing traffic on the Evangeline Thruway in Lafayette.</p>

Regarding hurricane evacuation, the proposed I-49 Connector will add six freeway lanes to the existing six lane signalized arterial. This will increase capacity of the corridor from 71,000 ADT for the no-build to 130,000 ADT with the freeway system. This added capacity with traffic management during hurricane events will provide adequate capability to evacuate both local and through traffic to I-10 and I-49 north of Lafayette.

Comment noted. See responses to comments below.

- A. Applicable Law
  - j. The regulations encourage agencies to coordinate Section 106 compliance with their NEPA compliance requiring that documentation of this compliance be included in the EIS.

C/N

- B. FHWA Violated Section 106 and Must Remedy these Violations before Proceeding with the I-49 Connector

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CH, 106				<p><i>1. The Agencies failed to Make a "Reasonable and Good Faith Effort" to Locate Historic Sites.</i></p> <p><i>a. The Agencies Failed to Invoke Consulting Parties in the Section 106 Process</i></p> <p>k. The brief specifically states that the Sterling Grove National Historic District Association should be granted consulting party status as per letter dated November 19, 2001, from the State Historic Preservation Officer (SHPO), yet the association is not mentioned in the report.</p>	<p>Consulting parties may participate in the Section 106 review process upon approval by the lead Federal agency, in this case the Federal Highway Administration (FHWA). No request for consulting party status was received by FHWA from a Sterling Grove Historic District Association. The Section 106 Adverse Effect Documentation report was completed in July 2000. The DEIS was circulated in November 2000. The SHPO letter supporting the position of the Association that it be considered a consulting party is dated November 19, 2001. The Sterling Grove National Historic District Association was not a consulting party when the Section 106 document was completed. Residents of the SGHD were specifically included in planning and mitigation meetings as follows:</p> <ul style="list-style-type: none"> <li>• The LCG in coordination with the LaDOTD conducted numerous charrettes and public meetings to help inform the public as well as receive input on issues regarding architecture, urbanism, and planning strategies. The charrettes and public meetings provided a collaborative exchange between the Community Design Workshop, the MPO committees, neighborhood organizations, the general public, and state and federal agencies.</li> <li>• Each residence in the Sterling Grove Historic</li> </ul>

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					District was contacted via U.S. Mail with notice of a meeting conducted jointly by LaDOTD and the Lafayette Consolidated Government. The purpose of this meeting, conducted the evening of December 6, 2001, was to develop mitigation measures appropriate for the SGHD due to visual impacts associated with the project. Design charrettes were conducted with opportunity for participation by individual persons. This meeting and the results of the design charrettes are documented in the report entitled <u>Summary of Stakeholder Meetings and Mitigation Opportunities</u> . It is noted that most attendees at the meeting, conducted for the benefit of SGHD residents, chose not to participate in the charrette process.
CH, 106				1. The brief states that the Section 106 report does not include any evidence of involvement by the Association or other members of the public.	Page 9 of the <u>Section 106 Adverse Effect Documentation: I-49 Connector Study Corridor, Lafayette, Louisiana</u> (Appendix E of the FEIS) states that "Interviews were conducted with local historians and preservationist organizations (e.g., the Lafayette Parish Preservation Committee), as well as individuals residing and/or working within the area of potential effect." Additionally, owners and occupants were interviewed where possible during the standing structure survey of 1,806 structures in the core area of the project, which included the entire SGHD.

*b. The "Area of Potential Effects" is Not Determinable from the FEIS or the Section 106 Report, and in Any Event Appears to be too Small*

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CH, 106		m.	The brief states that the FEIS violates Section 106 procedural requirements that "agencies determine and document the area of potential effect."		The limits of the area of potential effect (APE) were depicted in Exhibit 1 of <u>Section 106 Adverse Effect Documentation: I-49 Connector Study Corridor, Lafayette, Louisiana</u> . In the FEIS, the APE is illustrated in Exhibit 3-12. Reference to these drawings is made on Page 9 of the above report, and the APE is identified as "Limits of Standing Structure Survey." These limits are also described in the <u>Historic and Recommended Historic Properties within the I-49 Connector Study Corridor</u> report. This process meets the requirements of Section 106.
CH, 106		n.	The brief states that the APE is not defined in the FEIS.		The APE study area is illustrated in Exhibit 3-12 of the FEIS, labeled "Limits of Standing Structure Survey."
CH, 106		o.	The brief states that the APE is too small and is even smaller than the study area.		The APE was determined as indicated in the Division of Historic Preservation, Department of Culture, Recreation and Tourism (DHP) letter dated July 28, 1998, from the SHPO (FEIS Appendix A of Appendix E) based on a field survey by the SHPO's office, LaDOTD, and Coastal Environments, Incorporated. Based on the field survey, the APE was mutually agreed upon by FHWA, LaDOTD, and SHPO.
CH, 106		p.	The brief states that the APE should include the Central Business District (CBD).		The APE includes a portion of the Lafayette Central Business District. The area of the CBD included is that area that was mutually determined by the responsible agencies (FHWA, LaDOTD, and SHPO) to be a part of the APE. Reference is made to the SHPO letter dated July 28, 1998.
CH, 106		q.	The brief states that the I-49 Connector will physically and culturally cut the CBD off from a substantial part of the city.		The current Evangeline Thruway in the vicinity of the CBD is a six-lane signalized arterial roadway whose average daily traffic (ADT) volume in 1995 was

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				<p>approximately 47,000 vehicles (FEIS Exhibit 1-5). This major, high-volume roadway, in addition to the Union Pacific Railroad that runs parallel to the Thruway, already separates the CBD from those areas located on the east side of the Thruway. The I-49 Connector will provide direct freeway access to the CBD at two interchange locations, thus improving existing access for all residents of the region. Vehicular access on crossing streets to the CBD from those areas east of the present Thruway will be maintained via numerous grade separations at all major roadways (and many local streets) and pedestrian traffic will be facilitated by lessened surface traffic. The new facility will be designed at a sufficiently high elevation to provide visual continuity and openness across the corridor. Additionally, two new highway/railroad grade separations will be provided that increase access provisions to the CBD and also increase safety. The joint use plan for the corridor committed to in the FEIS (Table S-2) will include features that maintain and join the community on either side of the project.</p>	<p><i>C. The Agencies Failed to Make a "Reasonable and Good Faith Effort" to Identify Historic Sites Within the Study Area that They Studied</i></p> <p>r. The brief states that a "reasonable and good faith effort" to identify historic properties within the APE was not undertaken.</p>	<p>CH</p> <p>A total of 1,806 properties 50 years of age or older were identified within the APE in 1998-1999. In addition to identifying the six properties listed on the National Register of Historic Places (NRHP) (including the Sterling Grove Historic District) and the five properties eligible for listing on the NRHP within the APE, six additional properties were recommended as eligible for listing on the NRHP. Included among</p>

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				those properties recommended as eligible for listing on the NRHP were two districts comprised of 192 recorded structures over 50 years in age in the Mouton Addition and 43 in the S.R. Parkerson Addition ( <u>Historic and Recommended Historic Properties within the I-49 Connector Study Corridor</u> ). The DHP determined that neither the Mouton Addition nor the S.R. Parkerson Addition were eligible for listing on the NRHP. Similarly, the DHP determined that the Lafayette Protestant Cemetery was not eligible for listing on the NRHP. The DHP did agree with the recommendation that the Trappey's Plant Complex (comprised of six recorded structures) and Good Hope Hall are eligible for listing on the NRHP. The Sans Souci building is also eligible for listing on the NRHP, with this eligibility conditioned on if the Sans Souci building was the first post office serving the Vermillionville community (FEIS Section 4.2.4 and Appendix E, Section F).	The Lafayette Parish Preservation Committee (LPPC), a committee under the city-parish government of Lafayette that makes local historic property designations, was contacted in 1998. The LPPC provided a list of properties that the organization deemed historic. LPPC designated historic properties are not necessarily eligible for listing on the NRHP ( <u>Historic and Recommended Historic Properties within the I-49 Connector Study Corridor report</u> ).
CH		s.		The brief states that agencies are required to “[s]eek information, as appropriate, from consulting parties, and other individuals and organizations likely to have a knowledge of, or concerns with, historic properties in the area.”	The Section 106 Adverse Effect Documentation report (FEIS Appendix E) presents a synthesis of data. As described in the report, a variety of libraries and archival collections in Lafayette and East Baton Rouge
CH, 106		t.		The brief states that the Section 106 report “contains too few details to conclude that the agencies made a ‘reasonable and good faith effort.’” The Section 106 report contains no details such as number of residents	The Section 106 Adverse Effect Documentation report (FEIS Appendix E) presents a synthesis of data. As described in the report, a variety of libraries and archival collections in Lafayette and East Baton Rouge

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parishes were consulted as were oral informants. Information relative to historic properties not considered in the aforementioned report, those within the APE listed by the LPPC and those recommended as eligible for listing on the NRHP are discussed in the Historic and Recommended Historic Properties within the I-49 Connector Study Corridor report. Specific information relative to dating and other property specific information is provided on the individual Louisiana Historic Resources Inventory (LHRI) forms submitted to the DHP. Both reports, as well as the LHRI forms, were accepted by the DHP.

It is not customary that the credentials of historians be contained within the Section 106 documentation. Therefore, the credentials of the historians conducting the cultural and historical studies of the proposed project have been included in this table as a reference:

- Dr. David B. Kelley was the principal investigator for this project. Dr. Kelley holds a Ph.D. in Anthropology from Tulane University and is the director of the Cultural Resources Management Division at Coastal Environments, Inc. He has over 30 years experience in cultural resources management, 22 of those with Coastal Environments, Inc. Dr. Kelley has directed numerous cultural resources project including many which contained standing structure surveys and evaluations.
- Thurston Hahn, III, served as project manager for this project. Mr. Hahn holds a B.A. in History, with a minor in Anthropology from Louisiana

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					<p>State University. His curriculum included classes in vernacular architecture. He has over 15 years experience in cultural resources management and has conducted numerous standing structure surveys. He has also served as historian on many projects. All of the standing structure surveys conducted by Mr. Hahn have been reviewed and accepted by the Division of Historic Preservation, Department of Culture, Recreation and Tourism, and the State Historic Preservation Office, State of Louisiana.</p> <ul style="list-style-type: none"> <li>• Sara A. Hahn served as the field archaeologist for this project. Ms. Hahn holds a B.A. in Anthropology, with a minor in French from the University of Southwestern Louisiana (now University of Louisiana at Lafayette) and is a master's candidate in Anthropology at Louisiana State University. Her curriculum in the M.A. program at Louisiana State University has included classes in vernacular architecture and the recordation of historic structures. Ms. Hahn has over 8 years experience in cultural resources management and has conducted several standing structure surveys. In addition, Ms. Hahn served as historian for several HABS/HAER Documentation projects. All of the standing structure surveys conducted by Ms. Hahn, as well as the HABS/HAER Documentation has been reviewed and accepted by the Division of Historic Preservation, Department of Culture, Recreation and Tourism and the State Historic Preservation Office, State of Louisiana.</li> </ul>
					<p>*The first number in the comment number classifies the comment into one of the following categories: 1) Federal Agencies; 2) State Agencies; 3) Regional or Local Agencies; 4) Private Organizations or Groups; 5) Public Services; 6) Corporations/Businesses; 7) Other Interested Persons. The second number is an arbitrary number assigned to each comment within a category.</p> <p>**Subject codes referenced in the table for each comment are as follows: AL=Alternatives; AQ=Air Quality; BIO=Biological Resources; CON=Construction Impacts; CH=Cultural/Historic; CIR=Circulation/Traffic; CN=CEQA/NEPA Issues; CP=Corridor Preservation; CUM=Cumulative Impacts; EE=Emergency Evacuation Route; ED=Economic Development; FN=Funding; HW=Human Environment; HW=Hazardous Waste/Materials; LRA=Lafayette Regional Airport; LU=Land Use; MM=Mitigation Monitoring; NOI=Noise; NR=No Response; OP=Opinion; PN=Purpose &amp; Need; RD=Request for Data; RB=Residential/Business Relocation; TR=Transit; WE=Wetlands; WR=Water Resources; 4f=Section 4(f); 106=Section 106 Documentation.</p>

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CH				<p>u. The brief states that owners of 1,795 structures greater than 50 years old that agency determined not eligible were not given opportunity to weigh in.</p> <p>v. The brief states that agencies conducted standing structure survey on only small area and missed some structures potentially eligible for register.</p>	<p>Several public meetings were held during the course of the process. The opportunity was available for residents to voice their comments at those meetings. The Division of Historic Preservation, Department of Culture, Recreation and Tourism and the SHPO, do not require interviews with each property owner. Interviews were conducted where possible and the results are noted on the individual Louisiana Historic Resource Inventory forms. The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation state that "Identification is undertaken for the purpose of locating historic properties..." This identification can include several activities "which include, but are not limited to archival research, informant interviews, field survey and analysis. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. Generally, identification activities will have multiple objectives, reflecting complex management needs...The results of identification activities are then integrated into the planning process so that subsequent activities are based on the most up-to-date information. Identification activities are also undertaken in the absence of a comprehensive planning process, most frequently as part of a specific land use or development project."</p> <p>See responses to Comment No. 4-5 (o) and (w).</p>

### 2 *The Agencies Failed to Locate and Evaluate Several Sites that are Eligible for the National Register.*

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CH, 106	w.	The brief states that the Section 106 report does not mention many of the historic sites included in the <u>Historic and Recommended Historic Properties within the I-49 Connector Study Corridor</u> report, specifically Mouton Addition and Good Hope Hall, and represents a gross Section 106 violation. I-49 Connector runs adjacent to Mouton Addition and takes three structures from the area.	CH, 106	The DHP determined that neither the Mouton Addition nor the S.R. Parkerson Addition were eligible for listing on the NRHP. Similarly, the DHP determined that the Lafayette Protestant Cemetery was not eligible for listing on the NRHP. The DHP did agree with the recommendation that the Trapsey's Plant Complex (comprised of six recorded structures) and Good Hope Hall are eligible for listing on the NRHP and that the Sans Souci building may be eligible for listing on the NRHP (FEIS Appendix E, Section F). LPPC designated properties are not necessarily eligible for listing on the NRHP. The Section 106 <u>Adverse Effect Documentation</u> report as prepared for the I-49 Connector project considered only those historic properties listed on or eligible for inclusion on the NRHP that may be adversely affected by the proposed action.	

**3. The Majority of the Historic Sites Identified by the Agencies Were not Adequately Studied in the FEIS or in the Section 106 Report.**

- x. The brief states that eight of the eleven historic sites are addressed so lightly it is impossible to tell if agency adequately applied “criteria of adverse effect.” Specifically mentions Charles H. Mouton House, the Evangeline Hotel, the Caffrey House, Heymann Department Store, Sans Souci, Good Hope Hall, N.P. Moss School, and the [Lee] Arcenau House.
- CH
- The eight properties referred to are either listed on the NRHP or eligible for inclusion on the NRHP. All are within the APE. Of these properties, the Caffrey House is located nearest the undertaking. It lies approximately 240 m (790 ft) from alternatives RR-3 Elevated, RR-3 Selected and RR-4 Elevated, or about 275 m (900 ft) from the elevated portion of the proposed roadway. Like the remaining seven properties, the Caffrey House will be shielded from the proposed action by other urban structures and associated vegetation. As stated in the Section 106 Adverse Effect Documentation report, the proposed project will

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4F	y.			<p>not result in either direct (e.g., removal or demolition of these properties) or indirect (e.g., visual or aural) impacts to these properties. The fact that these properties are located within the area of potential effect does not necessarily mean that they will be adversely affected by the undertaking. The SHPO agreed with the results of the Section 106 Adverse Effect Documentation report and specifically stated "As indicated in the report, the proposed project area includes numerous historic properties; however, we concur that the effects are most likely at the Sterling Grove Historic District, which is on the National Register of Historic Places, and the Trappey's Plant Complex and Wallis Estate, both of which have been determined eligible for the National Register" (SHPO letter dated June 14, 2000).</p>	<p>The Section 106 Adverse Effect Documentation report determined that there would be an adverse visual effect upon the Sterling Grove Historic District. The Office of Environmental Policy and Compliance, U.S. Department of the Interior, asked for clarification on this matter on April 30, 2001. The FHWA subsequently determined that 4(f) was not applicable as there would be "no taking or use from the historic district" (FEIS Appendix C, Page C-201). The decision of non-applicability was made by FHWA at its Louisiana Division Office and written concurrence was provided by FHWA's Headquarters Office of NEPA Facilitation. "An 'adverse effect' under 36 CFR 800</p>

### *IV. The Proposed I-49 Connector Would Violate Department of Transportation Act Section 4(f)*

The brief states that the proposed I-49 Connector would violate Department of Transportation Act Section 4(f).

The Section 106 Adverse Effect Documentation report determined that there would be an adverse visual effect upon the Sterling Grove Historic District. The Office of Environmental Policy and Compliance, U.S. Department of the Interior, asked for clarification on this matter on April 30, 2001. The FHWA subsequently determined that 4(f) was not applicable as there would be "no taking or use from the historic district" (FEIS Appendix C, Page C-201). The decision of non-applicability was made by FHWA at its Louisiana Division Office and written concurrence was provided by FHWA's Headquarters Office of NEPA Facilitation. "An 'adverse effect' under 36 CFR 800

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<b>A. Section 4(f) Applies to Numerous Sites Within the Project Area</b>					
does not automatically mean that Section 4(f) applies" (Section 4(f) FHW A Policy Paper June 7, 1989).					
4F	z.	The brief states that numerous Section 4(f) properties lie in the vicinity of the I-49 Connector. FEIS identifies eight public parks near the project, notably Beaver Park. Also, 11 historic sites in project vicinity. Because these historic sites are on/eligible for National Register, Section 4(f) applies.		Regarding Beaver Park, it is noted that the proposed project will be constructed entirely within existing right-of-way. The access drive into Beaver Park from University Avenue will be relocated away from the project to provide less conflict with corridor traffic. This feature has been determined in conjunction with the Lafayette Recreation and Parks Commission and other Lafayette Consolidated Government agencies and will provide improved access over what currently exists. In addition, an existing joint use agreement allows for access from west Beaver Park to east Beaver Park; this access will be maintained under the proposed I-49 Connector project. Noise will increase at the park (from L <sub>eq</sub> (h) 71 dBA to 75 dBA). This is not considered a constructive use as this will not substantially alter or impair the purpose of the park.	
In terms of historic properties, only the Sterling Grove Historic District was determined to be adversely affected by the undertaking through the Section 106 process. It has been determined that 4(f) does not apply.					
<b>B. The Proposed I-49 Connector Would "Use" Numerous Sites Protected by Section 4(f)</b>					
4F	aa.	The brief states that the proposed I-49 Connector will "constructively" use several Section 4(f) properties and thus may not be constructed as proposed.		See responses to Comment No. 4-5 (y), (z), and (cc).	

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			NOI, CH, 4F	bb. The brief states that the increase in noise, impairs aesthetic features of a site, i.e., presence of the project substantially detracts from the setting of historic site.	See responses to Comment No. 4-5 (y), (z), and (cc).
4F				<p>cc. The brief states that the FEIS statement saying that, "Section 4(f) has been determined to be not applicable because there is no taking or constructive use from the historic district" is clearly erroneous. In the absence of a 4(f) statement there is no way to know how the agency reached this conclusion. Thus, even aside from the substantive issue, FHWA violated Section 4(f) procedurally.</p> <p><b><i>[A The Agencies' Brief Statement that the I-49 Connector Will not Use Any Section 4(f) Properties Does not Meet the Procedural Requirements of Section 4(f)]</i></b></p>	<p>Section 4(f) procedural requirements have been adhered to during the I-49 Connector EIS studies. Section 4(f) applies only when two criteria are satisfied:</p> <ol style="list-style-type: none"> <li>1) "First, it must be determined that we are dealing with a resource that is protected by the provisions of Section 4(f). These resources are parks, recreation areas, wildlife/waterfowl refuges, and historic/archaeological sites on or eligible for the National Register of Historic Places" (Section 4(f) FHWA Policy Paper June 7, 1989). "For purposes of Section 4(f), a historic site is significant only if it is on or eligible for the National Register of Historic Places, unless the FHWA determines that the application of Section 4(f) is otherwise appropriate. [The decision of non-applicability was made by FHWA at its Louisiana Division Office and written concurrence was provided by FHWA's Headquarters Office of NEPA Facilitation.] If a historic site is determined not to be on or eligible for the National Register of Historic Places, but an official (such as the Mayor, President of the local historic society, etc.) provides information to indicate that the historic site is of local significance, FHWA may apply Section 4(f)" (Section 4(f) FHWA</li> </ol>

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				Policy Paper June 7, 1989).	2) The second criterion states that “there must be a ‘use’ of land from the Section 4(f) resource for a transportation facility/project. Title 23 CFR 771.135(p) defines ‘use’ in three ways:

1. When land is permanently incorporated into a transportation facility,
  2. When there is a temporary occupancy of land that is adverse in terms of the statute’s preservationists purposes as determined by the criteria in paragraph (p)(7) of 23 CFR 771.135, and
  3. When there is a constructive use of land.”
- “A constructive use of a Section 4(f) site can occur when the capability to perform any of the site’s vital functions is substantially impaired by the proximity impacts from a transportation project. Such substantial impairment would occur when the proximity impacts to Section 4(f) lands are sufficiently serious that the value of the site in terms of its prior significance and enjoyment are substantially reduced or lost” (Section 4(f) FHWA Policy Paper June 7, 1989).

The Sterling Grove Historic District, a property listed on the NRHP, will be adversely affected by the undertaking, satisfying the first criterion for completing Section 4(f) documentation. None of the Sterling Grove Historic District will be permanently incorporated into a transportation facility, nor will

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				there be a temporary occupancy of the Sterling Grove Historic District. Although there will be an adverse effect on the Sterling Grove Historic District, that impact will not be "sufficiently serious that the value of the site in terms of its prior significance and enjoyment are substantially reduced or lost." In addition, an MOA has been developed to minimize the adverse visual impact upon the district. Since the second criterion for developing a Section 4(f) is not met by the undertaking, Section 4(f) is not applicable; therefore, the documentation was complete upon the determination of its non-applicability.	Regarding Beaver Park, see response to Comment No. 4-5 (z).
				<b>2. The Agencies Conclusion that the I-49 Connector Will Not Use Any Section 4(f) Properties is Substantially Erroneous</b>	Exception is taken to the use of the phrase "visual blight that has been acknowledged by the agency". Also, see response immediately above.
CH		dd.		The brief states that agencies repeatedly acknowledged proposed I-49 will have an adverse effect on the Sterling Grove Historic District. The project will run along the edge of Sterling Grove Historic District resulting in visual blight that has been acknowledged by the agency. This adverse visual effect alone is a constructive use.	See response to Comment No. 4-5 (q).
CH, CH		ee.		The brief states that the I-49 Connector will cut Sterling Grove Historic District off from the CBD, thus constituting a constructive use under FHWA's own regulations. References Fort Worth case.	See response to Comment No. 4-5 (z).
CH, NOI, 4F		ff.		The brief states that the FEIS acknowledges noise and visual effects will occur at Beaver Park, but contends those effects do not substantially impact the 4(f)	See response to Comment No. 4-5 (z).

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4F				<p>property. In fact, highways through parks are exactly what Congress addressed when it passed Section 4(f). It is not possible to determine how, in the absence of Section 4(f) documentation, that the undertaking will not “use” the park.</p>	See responses to Comment No. 4-5 (x) and (z). The SHPO determined that the Mouton Addition was not on or eligible for listing on the NRHP. Only sites on or eligible for listing on the NRHP are subject to additional evaluation.
4F	gg.			<p>The brief states that the undertaking will “use” several other protected sites - Mouton Addition and eight other properties agency failed to adequately evaluate.</p>	<p><b>C. Because “Feasible and Prudent Alternatives” Existed to the Proposed I-49 Connector that would not “Use” the Section 4(f) Properties or that Would “Use” Them with Less Adverse Effects, the Agencies May Not Select the Preferred Alternative</b></p> <p><i>1. There are Numerous Feasible and Prudent Alternatives to the Proposed I-49 Connector that would not Use Any Section 4(f) Properties</i></p>
4F, AL	hh.			<p>The brief states that numerous “feasible and prudent” alternatives to the I-49 Connector would not use any Section 4(f) sites. One such alternate is the Teche Ridge Alternate. Agency violated 4(f) by not choosing the Teche Ridge Alternate, they did not even discuss the alternative in the FEIS.</p>	No use of 4(f) sites has been identified for the proposed I-49 Connector. Regarding Teche Ridge, see response to Comment No. 3-4.
4F, AL	ii.			<p>The brief states that other prudent and feasible alternates exist and thus 4(f) has been violated. Agency</p>	<p><b>2. Of the Feasible and Prudent Alternatives Considered by the Agencies, the Selected Alternative is Not the Least Harmful to the Section 4(f) Properties</b></p>
					13 alternative alignments within the study corridor and five alternative highway types (partial upgrade, at-

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				<p>acknowledges other alternatives exist such as a depressed freeway that agency acknowledges, “may be technically feasible” and that the “depressed freeway could offer several opportunities to reduce certain socioeconomic impacts of the project (such as noise and visual mitigation).”</p> <p>Regarding the depressed freeway, this alternative was considered by FHWA and LaDOTD as marginally feasible hydraulically. As stated in the FEIS, (Pages 2-30 to 2-31), “Upon review of the study by state and federal agencies, it was decided that while the depressed freeway may be technically feasible as indicated by the hydraulic calculations, several issues with which a level of uncertainty regarding proper performance would exist. It was concluded that these issues coupled with the importance of the I-49 freeway as a hurricane evacuation route, were enough to make a decision that the depressed alternative for the core area should be removed from consideration.” Thus, the depressed alternative was deemed not safe or practical for the project and was rejected from further study.</p>	

<i>V. The FEIS Does not Comply With NEPA</i>
<i>A. The Agencies Failed to Consider Reasonable Alternatives</i>
<i>1. Applicable Law</i>
<i>a. Areas Outside the Evangeline Corridor Should Have Been Considered in the FEIS</i>

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		AL	jj.	The brief states that a route outside the city is viable but was never considered. According to the FEIS the I-49 Connector is designed to satisfy various local, state, and national needs. However, none of these needs necessitated confining the alternatives to a 5-mile area.	See response to Comment No. 3-4.
CTR		kk.		The brief states that the FEIS indicates the Evangeline Thruway exceeds current capacity at peak hours and traffic is expected to increase. However, FEIS contains no data supporting its statistic. Agency appears to have merely accepted numbers provided by Lafayette Department of Planning based on model it utilizes to help plan future transportation. FEIS has no information about the model so can't tell if model used is valid, thus denying effective public participation. No indication the agency scrutinized the model and data or whether they simply accepted them as true.	By law, the Lafayette area Metropolitan Planning Organization (MPO) is charged with transportation planning and policy matters for the region. One of its responsibilities includes travel demand forecasting for the region. TRANPLAN is a nationally recognized industry standard computer model in use by the Lafayette MPO and other MPOs across Louisiana at the time of the EIS studies. The traffic figures used in the EIS studies were obtained from this computer model output data. The model output data is consistent with observed growth trends over the last 20 years and is considered appropriate for use in the EIS and other planning studies in the region.
CIR, C/N, TR		ll.		The brief states that under NEPA, agency must "take a hard look at whether public transit could alleviate the immediacy of the need" for highway construction or expansion. However, the FEIS does not discuss expanding the existing bus system past existing truncated hours. In fact, agency did not even appear to have conducted a comprehensive and professional traffic study of the area and Lafayette in general. This omission invalidated the FEIS.	The MIS/Mode Meeting held on June 24, 1998, concluded that the development of a freeway in the Evangeline Thruway corridor should be implemented as transit improvements alone could not accommodate the existing and projected trips. The Federal Transit Administration concurred in the finding. An MIS/Mode Meeting Report is on file with the LaDOTD, and an MIS/Mode Meeting Summary is located in Appendix C of the FEIS.

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					improvement.
					The traffic model maintained by the Lafayette MPO covers the entire metropolitan area. Output data was used for the EIS studies for the I-49 Connector Study area.
					See response above.
CIR	mm.	The brief states that high-speed rail is a federally subsidized regional transportation alternative to building highway, which the agency failed to consider.			
					<b>b. LaDOTD Failed to Consider Alternatives that Would Not Affect Vulnerable Populations</b>
HE	nn.	The brief states that given the impacts to the poor, elderly, and minority populations in the area, agencies should have included other feasible alternatives outside the current corridor study area.			See response to Comment No. 3-4.
					<b>B. The Agencies Improperly Segmented the Highway Project and Therefore Failed to Comply with NEPA</b>
AI, CJM	00.	The brief states that the information in the FEIS is insufficient if it merely highlights the perils of a solitary portion of a larger project. Agencies must consider the cumulative impacts and environmental consequences of related projects when they are concurrently pending. The agencies entirely failed to analyze the environmental consequences of the entire proposed 130-mile highway.			The FHWA regulations outline three general principles at 23 CFR 771.111(f) that are to be used to frame a highway project. As stated in the regulations, "In order to ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated, the action evaluated in each EIS or finding of no significant impact shall:
					1) Connect logical termini and be of sufficient length to address environmental matters on a broad scope,
					2) Have independent utility or independent significance, and
					3) Not restrict consideration of alternatives for other reasonably foreseeable transportation

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improvements.

The proposed project has met these requirements as part of the scoping process and development of the Purpose and Need. The I-49 Connector has logical termini, independent utility, and does not restrict consideration of other transportation improvements in the area (even if no other portions of I-49 South are built). The project is demonstrated to meet logical termini and have independent utility as it meets the following components of the Purpose and Need:

- System Linkage – Connection of I-10 and I-49 north of Lafayette to U.S. 90 and U.S. 167; connection of I-10 and full freeway service to Lafayette Regional Airport (LRA); freeway connection to downtown multi-modal transit center; improved access to Beaver Park and other park facilities; freeway connectivity to the CBD; improved connectivity and compatibility with the existing and planned roadway network including University Avenue extension and Verot School Road extension (FEIS Section 1.3.1).
- Relieve existing and projected traffic in existing Evangeline Thruway corridor (FEIS Section 1.3.2).
- Long standing, numerous regional transportation plans that have identified the need for a freeway in the Evangeline Thruway corridor (FEIS Section 1.3.3).
- Meets intent of original enabling federal legislation and has local agency and governmental support (FEIS Section 1.3.4).

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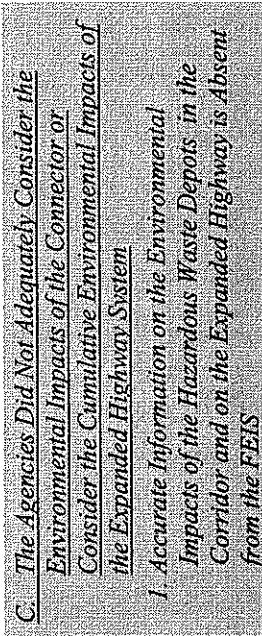
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				<ul style="list-style-type: none"> <li>Has beneficial intermodal relationships including rail, air, and bus transit connections. (FEIS Section 1.3.5).</li> <li>Provides improved safety in the corridor (FEIS Section 1.3.6).</li> <li>Hurricane evacuation – Eliminates the “choke point” for evacuation from the south on U.S. 90 in Lafayette, with 15 signalized intersections in the 5-mile I-49 Connector study area. This construction was proven during Hurricane Andrew in 1992 (FEIS Section 1.3.7).</li> <li>Increased Mobility – Increasing capacity in the Evangeline Thruway corridor will tend to attract traffic from other congested area roadways (such as University), thus increasing regional mobility (FEIS Section 1.3.8.b).</li> </ul>	

The above illustrates the value of the I-49 Connector as a stand-alone project. Connectivity of this portion to other portions is not required for the I-49 Connector to meet its independent Purpose and Need.



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	HW	pp.		The brief states that the agencies did not discuss how they intend to prevent "construction and/or use of the new roadway from increasing exposure." It is apparent that the agency did not thoroughly examine the potential threat of contamination and they make no commitment to do so. This is particularly alarming when coupled with the agency's statement that "A major issue is potential contamination of the Chicot Aquifer from hazardous sites." The FEIS is clearly deficient in its analysis of the threat of contamination from hazardous waste. Further, the agency completely failed to analyze the cumulative environmental impacts associated with hazardous waste on the entire interstate system spanning from New Orleans to Lafayette.	Items 7, 8, and 9 in Table S-2 of the FEIS provide a list of commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process. Also, see responses to Comment Nos. 7-621 (b) (1 <sup>st</sup> bullet) regarding potential spills by truck traffic and 7-635 (d) regarding hazardous waste sites in the corridor. Impacts associated with hazardous waste on other portions of I-49 South are being evaluated for each individual portion of the project and have no bearing on construction or independent utility of the I-49 Connector.
	HW, AL	qq.		The brief states that the prevalence of hazardous waste sites in the study corridor support the fact that the agency should have looked into other alternatives.	Multiple alternatives have been considered throughout the EIS process, including the numerous other supplemental studies performed to determine the most practical alternatives. Each of the alternatives considered would impact hazardous waste sites, which is not atypical for a project of this type.
	CUM	II.		The brief states that the studies relied upon to determine the existence of endangered species are simply outdated. The agencies rely on Eastern Forest – 1988, The Mammals of Louisiana and Its Adjacent Waters – 1974, and The Amphibians and Reptiles of Louisiana – 1989 to document the species that may be found in the study area.	In response to the Solicitation of Views, the U.S. Fish and Wildlife Service, who is the responsible federal agency, stated that no federally listed species occur within the area (May 13, 1998).

#### 2. The FEIS Contains Insufficient Information on Wetlands and Endangered Species in the Corridor and on the Expanded Highway Project

- II. The brief states that the studies relied upon to determine the existence of endangered species are simply outdated. The agencies rely on Eastern Forest – 1988, The Mammals of Louisiana and Its Adjacent Waters – 1974, and The Amphibians and Reptiles of Louisiana – 1989 to document the species that may be found in the study area.

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CUM	WE	ss.	The brief states that the agencies' discussion of the wetlands impacted by RR-4 is also insufficient.	The I-49 Connector in Lafayette is a stand-alone project that will work with or without other portions of I-49 South. Cumulative impacts on other portions of I-49 South are being evaluated for each individual portion of the project and have no bearing on construction or independent utility of the I-49 Connector.	In its comment letter dated February 26, 2002, the U.S. Corps of Engineers concurred with the Draft EIS wetland discussion.
NOI, CH	un.	tt.	The brief states that the agencies do not appear to have considered the cumulative impacts from the entire I-49 extension, including the possible impacts on wetlands or endangered and threatened species such as the American Black Bear, the Louisiana Black Bear, and the Red-cockaded Woodpecker.	<b>3. The FEIS Contains Insufficient Information on the Impacts of Noise in Neighborhoods</b>  The brief states that the FEIS discussion of noise impacts on the surrounding community is insufficient. The preferred alternative is an elevated Highway, yet all of the noise receptors were located within blocks of the proposed route. Noise impacts will be much more widespread, including in the Sterling Grove Historic District, yet the FEIS does not even attempt to take these impacts into account. It is also worth noting that agencies will not even try to mitigate the noise impacts because of cost.	Federal law requires that individual states establish noise policy regarding highway projects. In Louisiana, this policy is stated in the document "LADOTD's Highway Traffic Noise Policy, October 1997." Studies conducted for the I-49 Connector fall within the requirements established by the Louisiana policy, which is identified in the FEIS.

### 3. The FEIS Contains Insufficient Information on the Impacts of Noise in Neighborhoods

Federal law requires that individual states establish noise policy regarding highway projects. In Louisiana, this policy is stated in the document "LADOTD's Highway Traffic Noise Policy, October 1997." Studies conducted for the I-49 Connector fall within the requirements established by the Louisiana policy, which is identified in the FEIS.

The EIS shows that there will be slight increase in noise levels for a majority of the corridor. Under the Selected Alternative, however, throughout the corridor noise levels immediately abutting the Evangeline Thruway, including noise levels at the St. Genevieve Church and School within the Sterling Grove Historic District, will decrease because the ground level Thruway will be relocated farther away from the existing church and school and because through traffic will use the I-49 Connector freeway (which will remove traffic from the local street). Although these

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Issue				
CH, 4F, 106, C/N	vv.	The brief states the proposed I-49 Connector project violates federal law (NHPA, Section 4(f), and NEPA) and it is generally a "bad idea" for the historic city of Lafayette.		Noise reductions will be noticeable, the resulting levels will still exceed the LaDOTD's NAC and by definition the residences, schools and churches immediately abutting the Evangeline Thruway would still experience an acoustical impact. Sound walls and other noise reduction measures were considered but determined not practical and feasible according to the LaDOTD's criteria.
CH, 4F, 106, C/N	vv.	The brief states the proposed I-49 Connector project violates federal law (NHPA, Section 4(f), and NEPA) and it is generally a "bad idea" for the historic city of Lafayette.		Noise may increase at several locations along the corridor that were not specifically modeled. The noise receptor locations that were modeled in the FEIS are in areas where a change is expected. These modeled locations are typically within the first 100 to 200 feet of a developed area that abuts a proposed project.
CH, 4F, 106, C/N	vv.	The brief states the proposed I-49 Connector project violates federal law (NHPA, Section 4(f), and NEPA) and it is generally a "bad idea" for the historic city of Lafayette.		Within the Sterling Grove Historic District the second and third tier of homes paralleling the Evangeline Thruway would be exposed to less noise than the St. Genevieve Church and School. These homes would most likely experience an increase from existing noise levels (because the ground level buffer provided by the existing buildings and vegetation would be less effective for an elevated noise source), but the increase would probably not be great enough to meet the LaDOTD's definition of impact.
<b>VII. Conclusion</b>				
CH, 4F, 106, C/N	vv.	The brief states the proposed I-49 Connector project violates federal law (NHPA, Section 4(f), and NEPA) and it is generally a "bad idea" for the historic city of Lafayette.		Comment noted. The project is a result of a long-range transportation planning process that meets an identifiable transportation need and has undergone an extensive public involvement process. Also, see responses to Comment No. 4-5 (a) through (uu) above.

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4-6	Camille Lapeyrouse (on behalf of Concerned Citizens' Coalition)	10/2002	AL, EE OP	<p>a. Opposes the I-49 Connector through Lafayette. Agrees that hurricane evacuation needs to be provided for but states it can be achieved by other means.</p> <p>b. States that the Lafayette Consolidated Government (LCG) and the Lafayette Chamber of Commerce were the determining bodies for the I-49 route. States that governing bodies in other parishes have not been given input on this issue.</p> <p>c. Finds the FEIS deficient because it fails to plan for public safety needs, provide for any regional alternative routes, consider this portion's cost impacts on the rest of the project or perform a regional cost/benefit analysis.</p>	<p>Comment noted. Hurricane evacuation is effectively provided for by the I-49 Connector freeway through Lafayette. The project lies within Lafayette Parish and meets the purpose and need within these limits.</p> <p>LaDOTD and FHW A, as lead agencies on the I-49 Connector, have adopted the Selected Alternative in Lafayette Parish based on the effectiveness in meeting the purpose and need, impacts determined from the studies presented in the FEIS, and public input received on the project, including that input from local agencies and government. The process was widely publicized and open to all.</p> <p>The FEIS has concluded that access to fire, police, and hospital facilities will be improved due to the project (Page 4-41). Additionally, the FEIS demonstrates that hurricane evacuation will be provided for by the project. Therefore, public safety needs have been addressed. Refer to the response to Comment No. 3-4 regarding regional alternative routes. The cost of the I-49 Connector has no bearing on the viability of any other portions of I-49 south. Implementation cost estimates and numerous benefits including travel time savings, construction employment, increased mobility, increased hurricane evacuation, and other economic development opportunities have been identified for the proposed action as described in the FEIS.</p>
5-1	LA Rep. Sydnie Mae Durand	09/16/02	RD	Requests that a public hearing be held for the FEIS.	See response to Comment No. 3-2.

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6-1	Petroleum Helicopters, Inc. (PHI) Director of Operations	10/11/02	OP	<ul style="list-style-type: none"> <li>a. Supports the proposed project and states it is a needed improvement that will enhance safety along a dangerous stretch of highway. Also, states concerns about the proposals and the impact to PHI. Made recommendations to alleviate these concerns which included the following:           <ul style="list-style-type: none"> <li>• Continue to allow PHI employees direct access to the complex with the overpass at Kaliste Saloom;</li> <li>• Relocate any parking impacted from the proposed project at no expense to PHI;</li> <li>• Install sound barriers between the frontage road and PHI facility.</li> </ul> </li> </ul>	Comment noted.
	CIR				
	RB				
	NOI				
6-2	Bank One Pres.	9/25/02	OP	<ul style="list-style-type: none"> <li>a. Supports the proposed project and states it has regional, state and national importance. States that support for the project is strong, broad, and committed and refers to the "I-49 News Release" from 1998 which includes several organizations representing many thousands of individuals that are members of the coalition.</li> </ul>	Comment noted.
6-3	Billeaud Companies Pres.	10/30/02	OP	<ul style="list-style-type: none"> <li>a. Supports the I-49 Connector project and commends the Lafayette Metropolitan Planning Organization (MPO) for their efforts in gathering input throughout the course of the project from outside consultants, local groups and the public. Urges that the project move forward to</li> </ul>	Comment noted.

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6-4	Onebane Law Firm	10/21/02	OP	<p>a. Supports the I-49 Connector project and is concerned that the advocates of the Teche Ridge alignment may hinder the project similarly to what occurred in 1992 at the first DEIS public hearing.</p> <p>b. The commentor states that since time, local organizations have sought to reactivate the project and respond to the legitimate problems of affected citizens and the community. The commentor also points out that interested citizens have had ample opportunity to get involved in the planning process and the majority is supportive of the project.</p> <p>c. States that studies done in the early stages of the process looked at alternatives to the east and west of Lafayette and it indicated that federal funding formulas based on a cost/benefit analysis could not be met by any route which did not come directly through the community. A bypass may be beneficial later after the interstate is built but not now.</p> <p>d. Commentor urges that the project proceed with the I-49 Connector route chosen and approved by the MPO. States it is critical for traffic safety, hurricane evacuation, economic development and urban renewal in the community.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. See response to Comment No. 3-4.</p> <p>Comment noted. See response to Comment No. 3-4.</p>

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6-5	Life Style Lafayette Publisher	10/17/02	OP	<ul style="list-style-type: none"> <li>a. Supports the proposed project and states that a consensus has been reached by various community interest groups to support a direct route through Lafayette. Considerations that support this route include the following:</li> </ul> <ul style="list-style-type: none"> <li>• Easy access to major thoroughfares in Lafayette from the I-49 Connector. Any other route through rural areas would greatly inconvenience the majority of people traveling to Lafayette;</li> <li>• The project has undergone rigorous federally mandated guidelines for development. In addition, the LCG and Lafayette Chamber of Commerce have endorsed the project route.</li> <li>• States the corridor will be a catalyst for economic development and urban renewal. In addition, the project will facilitate orderly traffic flow through the metropolitan area.</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted.</li> </ul>
6-6	Lapeyrouse Motors Pres.	10/30/02	OP	<ul style="list-style-type: none"> <li>a. Opposes the I-49 Connector through Lafayette.</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted.</li> </ul>

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
	CIR			b. Does not feel the elevated highway through Lafayette will alleviate traffic.	As stated in the FEIS, improving traffic and circulation has been identified as part of the Purpose and Need for the proposed project. As stated in the FEIS (Page 2-20), "For the no-build alternative, the six-lane core area couplet system on Evangeline Thruway could not accommodate the 2025 average 71,000 ADT unconstrained demand volume assignment. Traffic would experience level of service "F"..." Therefore, the no-build alternative does not accommodate the purpose and need of the project. Traffic studies indicate that the freeway build alternative will accommodate projected traffic demand.
	AL			c. States the Teche Ridge route would keep hazardous materials out of the heavy populated area; provide for hurricane evacuation; cost less; be built in less time; and not endanger the Chicot Aquifer.	See response to Comment No. 3-4 regarding the Teche Ridge alignment Hurricane evacuation is effectively provided for by the I-49 Connector freeway through Lafayette. For additional information regarding hurricane evacuation refer to response to Comment 4-5 (i). Items 7, 8, and 9 in Table S-2 in the FEIS provides commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process. See response to Comment No. 4-5 (h) for issues regarding cost and time of construction.
7.1 to 7-122 (122 individual letters received)		Form letter from citizens in region	OP	a. Opposes the I-49 Connector project. States that the FEIS is deficient and does not feel it makes a case for the Record of Decision. The commentors believe that the FEIS fails to:	Impacts due to the I-49 Connector have been explored in detail throughout the EIS process and documented in the FEIS. The document has undergone extensive analysis, public involvement, and agency review by those agencies mandated to address concerns for this type of comprehensive project. Lead and cooperating agencies have concurred in the findings and approved

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## I-49 Connector Final EIS

### Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				<ul style="list-style-type: none"> <li>• Plan for regional needs;</li> <li>• Select a final route;</li> <li>• Calculate actual cost;</li> <li>• Provide a cost/benefit analysis;</li> </ul>	<p>the Selected Alternative as stated in the document.</p> <ul style="list-style-type: none"> <li>• The I-49 Connector is consistent with regional plans for the area's highway network.</li> <li>• A Selected Alternative is identified in Section S.5.3 (<i>Selected Alternative</i>) of the FEIS.</li> <li>• The construction, property acquisition, mitigation, and engineering cost estimates have been developed based on the level of detail of the study and are presented in the FEIS (Section 2.2.4, <i>Costs</i>).</li> <li>• Generalized costs and benefits of the various elements of the proposed alternatives have been identified in the FEIS. A summary matrix is presented in Exhibit S-4 in the FEIS. As stated in Title 40, Code of Federal Regulations, Section §1502.23, "For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations."</li> <li>• The Joint Cooperative Endeavor Agreement (JCEA) (FEIS Appendix G) between LaDOTD and LCG identifies a minimum level of funding to be available annually for the I-49 Connector project. Additional funding will be sought in the next federal highway legislation to be developed in 2003.</li> <li>• Identify funding sources;</li> <li>• Support its conclusions with objective research;</li> <li>• See general response to (a) above.</li> </ul>
					<p>*The first number in the comment number classifies the comment into one of the following categories: 1) Federal Agencies, 2) State Agencies, 3) Regional or Local Agencies, 4) Private Organizations or Groups, 5) Public Services, 6) Corporations/Businesses, 7) Other Interested Persons. The second number is an arbitrary number assigned to each comment within a category.</p> <p>**Subject codes referenced in the table for each comment are as follows: AI=Alternatives; AQ=Air Quality; BIO=Biological Resources; CON=Construction Impacts; CH=Cultural/Historic; CIR=Circulation/Traffic; C/N= CEQA/NEPA Issues; CP=Corridor Preservation; CUM=Cumulative Impacts; EE=Emergency Evacuation Route; ED=Economic Development; FN=Funding; HE=Human Environment; HW=Hazardous Waste/Materials; LRA=Lafayette Regional Airport; LU=Land Use; MM=Mitigation Monitoring; NOI=Noise; NR=No Response; OP=Opinion; PN=Purpose &amp; Need; RD=Request for Data; RB=Residential/Business Relocation; TR=Transit; WE=Water Resources; WR=Wetlands; A-47</p>

# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				<ul style="list-style-type: none"> <li>Provide specific plans to relieve negative effects on the community;</li> <li>Consider the impact of the expensive Lafayette section on the remainder of the project; and</li> <li>Safeguard against homeland security and hazardous waste issues.</li> </ul>	<ul style="list-style-type: none"> <li>Community planning to minimize impacts of the project has been conducted in numerous charrettes and workshops during the course of the EIS studies. An MOA has been developed regarding visual impacts at the SGHD. A joint use development plan will be developed with public input during subsequent phases of the project. Also, the new facility will be designed at a sufficiently high elevation to provide visual continuity and openness across the corridor. The joint use plan for the corridor committed to in the FEIS will include features that maintain and join the community on either side of the project.</li> <li>The I-49 Connector in Lafayette is a stand-alone project that will work with or without other portions of I-49 South. Costs of the I-49 Connector or other portions of I-49 South are being evaluated for each individual portion of the project and have no bearing on construction or independent utility of one another.</li> <li>Heightened awareness of homeland security issues is a recent development. Interstate highways and other freeways are recognized as a part of the Strategic Highway Network (STRAHNET) serving defense needs. Regarding hazardous waste issue, items 7, 8, and 9 in Table S-2 of the FEIS provide a list of commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and</li> </ul>

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## I-49 Connector Final EIS

### Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
b.	States that the FEIS admits that the all proposed connector routes would:				construction process. Also, see responses to Comment Nos. 7-621 (b) (1 <sup>st</sup> bullet) and 7-635 (d). See general response to (a) above.
	• Unfairly affect the minority, poor, and elderly of Lafayette;				• See response to Comment No. 7-649 (b) (2 <sup>nd</sup> bullet).
	• Bring great harm to the quality of life in the impacted area;				• Negative and positive impacts have been identified in the FEIS. Commitments and mitigation measures regarding negative impacts are identified in Table S-2.
	• Destroy businesses, homes and infrastructure;				• See response in bullet above.
	• Increase noise and pollution;				• See response in bullet above.
	• Threaten the Chicot Aquifer;				• See response in bullet above.
	• Jeopardize hurricane evacuation and imperil emergency and safety situations;				• Hurricane evacuation and safety have been established as an item supporting the purpose and need for the project. Although this project lies completely in Lafayette Parish, residents of surrounding parishes will experience hurricane evacuation and safety benefits. FEIS demonstrates that hurricane evacuation will be provided for by the project. Additionally, the FEIS has concluded that access to fire, police, and hospital facilities will be improved due to the project (Page 4-1). Therefore, public safety needs have been addressed. These and other aspects of the project purpose and need are fully discussed in Chapter 1 of the EIS.
	• Bulldoze oxygen-producing trees and pave over rain-absorbing ground;				• Vegetation will be removed as needed to construct the proposed project. New landscaping will be incorporated into the project in accordance with

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## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-123 to 7-312 (190 individual letters received)	Form letter from citizens in region	10/14/02	OP	<ul style="list-style-type: none"> <li>• Threaten flood-retaining, habitat-providing wetlands; and</li> <li>• Reduce property and sales tax revenue.</li> </ul>	<p>the MOA and as identified in the joint use plan to be developed for the corridor.</p> <ul style="list-style-type: none"> <li>• Five acres of floodplain will be filled as a part of the project. Floodplain study as indicated in Section 4.3.1 of the FEIS indicates that no measurable impact will occur to the flood retention value of the wetlands. Mitigation of wetland impacts will be coordinated with the U.S. Army Corps of Engineers during the 404 permitting process.</li> <li>• The immediate impact of the project will be to remove property from the tax rolls, thus decreasing revenue. Long-term economic development opportunities for the region will be created that may more than offset this initial loss.</li> </ul> <p>The I-49 Connector in Lafayette is a stand-alone project that will work with or without other portions of I-49 South. The cost of the I-49 Connector portion will have no impact on the viability of other portions of I-49 to the south.</p> <p>Comment noted.</p>
	EE			<p>a. Concerned that the cost associated with the project will threaten completion of an interstate route to New Orleans.</p> <p>b. Stresses the international, national, and regional importance of completing I-49 from Lafayette to New Orleans as an emergency evacuation route for the residents of southeastern coastal parishes and of the southern Mississippi River west bank areas.</p>	
	OP			<p>c. Opposes the I-49 Connector project and states that the FEIS is deficient because it fails to:</p>	Comment noted. See general response to Comment No. 7-1 to 7-122 (a).

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				<ul style="list-style-type: none"> <li>• Plan for regional economic development and public safety needs;</li> <li>• Provide any regional alternative routes;</li> <li>• Consider this portion's impact on the remainder of the project;</li> <li>• Calculate the cost of this portion and the impact of that cost on the rest of the project;</li> <li>• Perform regional cost/benefit analysis; and</li> <li>• Address funding sources for the entire project.</li> </ul>	<p>The I-49 Connector is consistent with regional plans for the area's highway network, which in part has been identified based on economic development considerations. Regarding public safety, the FEIS has concluded that access to fire, police, and hospital facilities will be improved due to the project (Page 4-1). Additionally, the FEIS demonstrates that hurricane evacuation will be provided for by the project. Therefore, public safety needs have been addressed.</p> <p>See response to Comment No. 3-4.</p> <p>See response to Comment No. 4-5 (oo).</p> <p>The cost of the I-49 Connector has no bearing on the viability of any other portions of I-49 south. Implementation cost estimates and numerous benefits including travel time savings, construction employment, increased mobility, increased hurricane evacuation, and other economic development opportunities have been identified for the proposed action as described in the FEIS.</p> <p>A primary purpose and need for the I-49 Connector is to address traffic needs in Lafayette. Regional needs (for example hurricane evacuation) are accommodated. Also, regarding cost/benefit analysis, see response to Comment No. 7-1 to 7-122 (a) (4th bullet).</p> <p>See response to Comment No. 7-1 to 7-122 (a) (5<sup>th</sup> bullet).</p>

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
	HW, WR	09/09/02	RD	d. Also states that construction of the project would introduce known hazardous and dangerous material in the Chicot Aquifer.	Items 7, 8, and 9 of Table S-2 in the FEIS provide commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process.
7-313 to 7-337 (25 individual letters received)	Form letter from citizens in region	10/2002	FN	a. Requests that a public hearing be held for the project and also requests that the comment period for the FEIS be extended to 60 days.  b. One commentator (Pam Leblonde) requests that an EIS be completed on the Teche Ridge Alternate before a final decision is made for the project. Also questions whether the truck traffic diverted to Louisiana Avenue from the Evangeline Thruway was studied.	See response to Comment No. 3-2.  Comment noted. See response to Comment No. 3-4 regarding the Teche Ridge alignment/The Louisiana Avenue interchange with connection to Johnston Street has been included in the MPO computer transportation model used for the EIS studies.
7-338 to 7-346 (9 individual letters received)	Form letter from citizens in region	RD		a. Concerned that the cost associated with the project will threaten completion of an interstate route to New Orleans and states the roadway to New Orleans must be built for traffic safety.  b. Concerned that issues for the region (including surrounding parishes) were not fully addressed and requests that copies be provided to those in neighboring parishes.	See response to Comment No. 7-123 to 7-312 (a).  A primary purpose and need for the I-49 Connector is to address traffic needs in Lafayette. Regional needs (for example hurricane evacuation) are accommodated. Copies of the FEIS have been distributed to federal, state, and local agencies; pertinent federal, state, regional, and local elected officials; and state and local libraries located in Lafayette, Baton Rouge, and New Orleans.
				c. Also requests that public meetings be held in these areas and the public comment period for the FEIS be lengthened to 60 days.	See response to Comment No. 3-2.

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-347 to 7-611 (265 individual letters received)	Form letter from citizens in region	10/2002	OP	<ul style="list-style-type: none"> <li>a. Opposes the I-49 Connector route through the city of Lafayette. Supports a bypass to loop around the city instead due to the following concerns:           <ul style="list-style-type: none"> <li>• Poor, minority, and elderly would bear the burden of this highway;</li> </ul> </li> </ul>	<p>See responses below and response to Comment No. 3-4.</p> <ul style="list-style-type: none"> <li>• See response to Comment No. 7-649 (b) (2<sup>nd</sup> bullet).</li> </ul>
	HE				
	CH			<ul style="list-style-type: none"> <li>• Our oldest most historic neighborhoods would suffer irreparable harm;</li> </ul>	<ul style="list-style-type: none"> <li>• See response to Comment No. 7-626 (f).</li> </ul>
	RB			<ul style="list-style-type: none"> <li>• Loss of homes, churches, charitable organizations, schools, businesses, and jobs;</li> </ul>	<ul style="list-style-type: none"> <li>• See responses to Comment Nos. 3-6 (c) 3<sup>rd</sup> bullet and 6-1 2<sup>nd</sup> bullet.</li> </ul>
	NOI, AQ			<ul style="list-style-type: none"> <li>• Noise, pollution, danger to residents from routing interstate traffic through our community;</li> </ul>	<ul style="list-style-type: none"> <li>• See responses to Comment Nos. 7-636 (d) and 7-635 (i).</li> </ul>
	CP, CON			<ul style="list-style-type: none"> <li>• A wall dividing our city preceded by the years of construction residents must endure;</li> </ul>	<ul style="list-style-type: none"> <li>• See responses to Comment Nos. 7-621 (a) (2<sup>nd</sup> bullet) and 7-633 (e).</li> </ul>
	EE				
	FN			<ul style="list-style-type: none"> <li>• The bottleneck Lafayette becomes during evacuations is not solved by an elevated I-49; and</li> <li>• Spending hundreds of millions for 5 miles through Lafayette leaves what for completion of I-49 to New Orleans?</li> </ul>	<ul style="list-style-type: none"> <li>• See responses to Comment Nos. 4-5 (h), 4-5 (i), and 7-618 (c).</li> <li>• See response to Comment No. 7-123 to 7-312 (a).</li> </ul>
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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				<ul style="list-style-type: none"> <li>• The project, loss of, and decrease in value of local homes.</li> <li>• States that the poor, elderly, and minority populations will be most impacted by the project. Also concerned for the schools, churches, Visitors' Center, and the Green House Senior Center on or near the Thruway.</li> <li>• States the historic district, including St. Genevieve will be harmed by the project.</li> <li>• Does not want the city to be divided by a wall.</li> <li>• States that an eastern bypass is available that does not disturb wetlands. States the time and money would be better spent developing this route and also provide for a safe evacuation route for all of south Louisiana.</li> <li>• One petition form states that the signs along Evangeline Thruway for the future I-49 Corridor have been used although neither local, state, or federal government has approved it.</li> </ul>	<p>The LCG Corridor Preservation and Management Action Plan, which is part of the Joint Cooperative Endeavor Agreement (FEIS Appendix G), addresses the procedures developed to ensure that home and business owners impacted are well informed and they are given fair compensation as the acquisition of rights-of-way occur over time.</p> <ul style="list-style-type: none"> <li>• Each of the alternatives considered would affect the stated populations. The Selected Alternative minimizes impacts to these groups. Regarding the facilities mentioned, see response immediately above. Additionally, the Lafayette Gateway Visitor's Center is located on LaDOTD right-of-way and is subject to conditions of a joint use agreement calling for it to move should its location be needed for highway purposes.</li> <li>• See response to Comment No. 4-4 (c).</li> <li>• See responses to Comment Nos. 7-621 (a) (2<sup>nd</sup> bullet) and 7-633 (e).</li> <li>• See response to Comment Nos. 3-4 regarding bypass alignment and 7-613 (a) regarding hurricane evacuation.</li> <li>• The signs referred to have been erected based on federal, state, and local support for the project. As stated in the FEIS (Page 1-15), "The U.S. 90 route through Lafayette to the south has recently been</li> </ul>

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## Summary of Comments and Responses

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7-613	Camille and J.P. Lapeyrouse	09/17/02	OP	<ul style="list-style-type: none"> <li>a. States that the proposed project will affect people in surrounding parishes due to hurricane evacuation.</li> </ul>	Hurricane evacuation has been established as an item supporting the purpose and need for the project. Although this project lies completely in Lafayette Parish, residents of surrounding parishes will experience hurricane evacuation benefits. This and other aspects of the project purpose and need are fully discussed in Chapter 1 of the EIS.
RD				<ul style="list-style-type: none"> <li>b. Requests that people in surrounding parishes be provided access to the FEIS.</li> </ul>	Copies of the FEIS have been distributed to federal, state, and local agencies; pertinent federal, state, regional, and local elected officials; and state and local libraries located in Lafayette, Baton Rouge, and New Orleans.
RD				<ul style="list-style-type: none"> <li>c. Also requests that a public hearing be held in neighboring parishes as well as in Lafayette and that the public comment period be lengthened to at least 60 days.</li> </ul>	See response to Comment No. 3-2.
7-614	Jean Kramer	09/06/02	OP	<ul style="list-style-type: none"> <li>a. Supports the I-49 Connector project and states that it needs to proceed as presented in the report.</li> </ul>	Comment noted.
7-615	Donna M.	10/11/02	AL	<ul style="list-style-type: none"> <li>a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through</li> </ul>	See response to Comment No. 3-4.

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## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
	Lanza			Lafayette.	
7-616	F. A. Fontenot	10/03/02	OP	b. States it would cost less and be better for hurricane evacuation to have a route outside of the city.	See responses to Comment Nos. 3-4, 4-5 (h), 4-5 (i), and 7-613 (a). Hurricane evacuation is provided for by the I-49 Connector freeway through Lafayette.
				a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette.	See response to Comment No. 3-4.
				b. States a bypass route would cost less, have less displacements, less environmental impacts, and would better serve traffic needs in the area.	See responses to Comment Nos. 3-4 and 4-5 (h).
				c. Concerned with the traffic capacity analysis reported in the FEIS. Commentor references the FEIS as stating that the facility is expected to operate at level of service (LOS) D in the year 2025 and may operate at LOS E or worse by year 2030. The commentor is concerned that this LOS will cause an inconvenience to drivers and thus be will be a bad investment for the city.	Industry planning and design standards use a 20-25 year planning horizon for projects such as the I-49 Connector. The project is expected to operate satisfactorily within this period of time.
				a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette.	See response to Comment No. 3-4.
				b. States that politics have influenced some leaders and planners throughout the decision making process for the project. Also did not agree with the time schedules used for public meetings.	Comment noted.
7-617	Betty Wiggs	10/2002	AL		
				a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette.	See response to Comment No. 3-4.
				OP	
				b. States that politics have influenced some leaders and planners throughout the decision making process for the project. Also did not agree with the time schedules used for public meetings.	Comment noted.
7-618	Robert Paterson	10/2002	AL		
				a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette.	See response to Comment No. 3-4.

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## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
		FN		b. Concerned that federal funding will not be given to the project because it is so expensive.	Issuing a ROD on this project will allow the project to compete for federal funding in the next federal highway legislation that is currently being crafted for consideration in 2003.
	EE			c. Also concerned about hurricane evacuation through the I-49 corridor during the construction phase.	During project construction, traffic will generally remain on the existing at grade Evangeline Thruway while the I-49 Connector is constructed. Following construction, the Evangeline Thruway will act as parallel frontage roads for the new portion of I-49.
7-619	Irwin Thomas	09/19/02	AL	a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette. States construction on the ground would be cheaper than an elevated road.	See responses to Comment Nos. 3-4 and 4-5 (h).
	OP			b. States that building a loop around the city would not disrupt homes and businesses along present Evangeline Thruway, would not disrupt present traffic flow in the city, and would allow present businesses along US 90 direct access for traffic instead of being located on service roads parallel to the new I-49. Does not want the I-49 Connector to be a wall across Lafayette.	See response to Comment No. 3-4 regarding loop idea. Within the limits of the proposed I-49 Connector project, access to homes and businesses will continue to be provided by the existing Evangeline Thruway that will remain in place with minor modifications. For wall comment, refer to responses provided for Comment Nos. 7-621 (a) (2 <sup>nd</sup> bullet) and 7-633 (e).
7-620	Patrick Prejean	09/10/02	AL	a. Prefers an alignment that loops around the city instead of having the I-49 Connector alignment go through Lafayette.	See response to Comment No. 3-4.
	OP			b. States a loop around the city would cost less and take less time to build compared to the I-49 Connector due to the relocation of homes, businesses and utility systems.	See responses to Comment Nos. 3-4, and 4-5 (h).
	CIR			c. Also states that widening the thruway (construction currently underway) will be able to serve the local traffic needs of the city with the loop serving through	As stated in the EIS (Page 1-12), "...the addition of a new signalized intersection at Evangeline Thruway and Castille Avenue along with the widening of the Thruway

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				traffic around the city.	<p>to six lanes in this area, scheduled for completion in Spring 2003, will provide partial relief for the operational difficulties in this area." These improvements were considered to be in place when the no-build alternative was analyzed. As stated in the FEIS (Page 2-20), "For the no-build alternative, the six-lane core area couplet system on Evangeline Thruway could not accommodate the 2025 average 71,000 ADT unconstrained demand volume assignment. Traffic would experience level of service "F".' Therefore, the no-build alternative does not accommodate the purpose and need of the project.</p> <p>Comment noted. This is a local enforcement issue. Also, these issues will be considered during the joint use planning studies.</p>
				d. Concerned that the I-49 Connector will become a haven for homeless people and drug addicts.	
OP				a. Opposes the I-49 Connector project and states that the LaDOTD was not fair in its:	<ul style="list-style-type: none"> <li>• Recommendation for the Evangeline Thruway corridor (says same corridor was scrapped in 1992 because it did not receive public approval).</li> <li>• The proposed project was withdrawn after the 1992 public hearing. Subsequently, due to local government initiatives, a reconciled set of new alternatives in the Evangeline Thruway corridor were developed based on input received at the 1992 public hearing and the Lafayette North/South Corridor Study, Path To Progress report, dated September 1993, developed by the MPO. Other corridors considered in the North/South Corridor Study did not meet the primary purpose and need of the project to relieve traffic congestion in Lafayette. Refer to response to Comment 3-4.</li> </ul> <p>• Consideration of experiences gained from</p> <ul style="list-style-type: none"> <li>• The elevated freeway alternative has been</li> </ul>
7-621	Coleen LeBlanc	10/2002	OP		<ul style="list-style-type: none"> <li>• The elevated freeway alternative has been</li> </ul>

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				development of previous elevated freeway projects in urban areas.	identified as the selected alternative to minimize traffic circulation and other impacts. The cumulative experiences gained in Louisiana and other areas have been considered during initial planning and will be employed during design of the project. Examples of this planning include project features such as long span bridges, extra height to promote openness under the freeway, and the commitment to develop a joint use plan with additional public involvement for the corridor.
				<ul style="list-style-type: none"> <li>• Failure to counsel the MPO on the right of a citizen to speak at a public meeting (the MPO was subsequently directed by the District Attorney to have another meeting to allow public comment).</li> <li>• Also concerned with the effects an elevated roadway would have on the community and the possibility of:</li> </ul>	<ul style="list-style-type: none"> <li>• The meeting in question was conducted by the MPO. Protocol issues arose that were addressed by the MPO and District Attorney.</li> <li>• Comment noted.</li> </ul>
HE	HW			<ul style="list-style-type: none"> <li>• Chemical Spills,</li> </ul>	<ul style="list-style-type: none"> <li>• Hazardous materials and wastes are currently transported in tanker trucks through Lafayette on the Evangeline Thruway (US Hwy 90 and US Hwy 167). Despite lower existing speed limits along Evangeline Thruway, the existing potential for a hazardous release to occur as the result of an accident is possible. Statistics indicate that a controlled access freeway such as the I-49 Connector is inherently safer than a signalized arterial such as the existing Evangeline Thruway due to fewer conflict points along the facility such as intersections and driveways.</li> </ul>

The utilization of a new freeway in this location would make the facility safer. That the freeway is elevated would have no bearing on the potential for

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-622	L. J. "Joey" Durel	09/27/02	OP	<p>a. Supports the I-49 Connector project through Lafayette.</p> <p>The commentor emphasizes the "tremendous" support</p>	Comment noted.
			AQ	<ul style="list-style-type: none"> <li>• Air pollution,</li> <li>• Noise, and</li> <li>• Crime.</li> </ul>	<ul style="list-style-type: none"> <li>• See response to Comment No. 7-635 (i).</li> <li>• See response to Comment No. 7-636 (d).</li> </ul>
			NOI		<ul style="list-style-type: none"> <li>• Comment noted. This is a local enforcement issue.</li> </ul>
			OP	<ul style="list-style-type: none"> <li>• Also, this issue will be considered during the joint use planning studies.</li> </ul>	an accident.
			FN, MM	<p>c. States that funds to mitigate impacts of the project will not be provided.</p>	<p>Issuing a ROD will enable the project to compete for federal funding in the next federal highway legislation that is currently being crafted for consideration in 2003. Local and state funds will also be allocated over time for the project as the next phase begins with corridor preservation and design in conjunction with a public involvement program. The Joint Cooperative Endeavor Agreement (JCEA) (FEIS, Appendix G) and Table S-2 in the FEIS provide certain commitments and mitigation measures that are required as a part of the implementation of the project. The LCG may choose to exceed minimum commitments and mitigation requirements.</p>

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Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-623	Karl Naumann	10/11/02	OP	<ul style="list-style-type: none"> <li>a. Recommends that the highway be built to account for future growth.</li> <li>b. Recommends that emergency ramps be built to allow southbound lanes to be used for northbound traffic in the event of hurricane or other emergency evacuations.</li> </ul>	Comment noted.
7-624 to 7-625 (two individual letters received)	Gerard Garcia and Susan Garcia	10/11/02	OP, WR	<ul style="list-style-type: none"> <li>a. Opposes the I-49 Connector through Lafayette. States that it will threaten the water supply with construction near the Chicot Aquifer.</li> <li>c. Stressess that Lafayette and south Louisiana needs I-49 built as soon as possible.</li> </ul>	Items 7, 8, and 9 of Table S-2 in the FEIS provide commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process.
7-626	J.W. Barrois	10/12/02	RD	<ul style="list-style-type: none"> <li>a. Demands that an official public hearing be called for the FEIS.</li> <li>b. States the Teche Ridge route around the city would be better for traffic, displace fewer homes and businesses, provide for hurricane evacuation, cost less, and take less time to build compared to the I-49 Connector.</li> <li>c. States that support for the project has been materialized by citizens committees and all hearsay.</li> </ul>	See response to Comment No. 3-2.
			OP	<ul style="list-style-type: none"> <li>b. States that the FEIS has not adequately addressed and answered issues raised following the first DEIS public hearing several years ago.</li> </ul>	See response to Comment No. 3-4, 4-5 (h), and 4-5 (i).
			OP	<ul style="list-style-type: none"> <li>c. States that support for the project has been materialized by citizens committees and all hearsay.</li> </ul>	See response to Comment No. 3-2.

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	RB			d. Questions where the housing for displaced families will come from and where will they be. States the public has not been given accurate estimates regarding these numbers and that expense. Asks if the relocations will be addressed publicly.	See response to Comment No. 3-6 (c) 3 <sup>rd</sup> bullet.  As stated in the FEIS, Section 4.2.2.e ( <i>Last Resort Housing Plan</i> ), "A last resort housing plan for the project has been included in the LCG Corridor Preservation and Management Action Plan. The displacee's relocation will be handled according to the provisions of last resort housing when a residential displacee cannot be relocated into comparable housing without exceeding the monetary limits..." These provisions are set forth by FHWA and will be implemented by LaDOTD for the proposed project.
	FN			e. Stresses that the cost estimate reported does not reflect costs for environmental remediation or possible aquifer contamination.	Estimates for right-of-way acquisition have been determined based on the level of detail of the study and are in the FEIS. A more detailed evaluation will be made during the next phase as corridor preservation is begun along the corridor. The LCG Corridor Preservation and Management Action Plan contains provisions for informing the public regarding the right-of-way acquisition program.  Landowners are required by law to bear the cost of waste cleanup. Additional waste cleanup may be needed to a higher level depending on the use of the right-of-way and LaDEQ requirements. Details on these costs will not be known until the project design and construction phase. The I-49 Connector cost estimate contains a contingency allowance for cost items that cannot be accurately estimated at the level of detail of the EIS studies.

As noted in the response to Comment No. 4-5 (pp), design and construction techniques will be utilized that

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			CH, NOI	f. Concerned with the effect the project will have on the historic St. Genevieve Church and the surrounding neighborhood, in particular traffic noise levels.	The Section 106 Adverse Effect Documentation report has determined that the project will have adverse visual affects on the Sterling Grove Historic District. No other impacts were identified from the report. A MOA was developed by LaDOTD and FHWA in coordination with LCG and SHPO (FEIS Appendix F) to mitigate the adverse visual affects.  Based upon the noise analysis contained in the FEIS (Section 4.2.10), noise levels near St. Genevieve Church and School will actually be less than the current noise levels in the same area due to the fact that traffic will be further away from the church and school (existing Evangeline Thruway will be realigned away from the face of the church under the project). Construction noise will be minimized for all churches in the area, including St. Genevieve, by ceasing operations immediately adjacent to the churches during weekend services and holy day observances. Refer to the commitment indicated in Item 5 of Table S-2 of the FEIS. Regarding noise at other locations in the District, refer to response to Comment No. 7-640 (d).  See response above.
			CH	g. States that the roadway will destroy the historic district and it will cease to exist as an entity.	See responses to Comment Nos. 3-2 and 7-1 to 7-122 (general response).
7-627	Brenda Barrios	10/12/02	RD	a. Requests that a public hearing be held for the FEIS. Concerned that issues raised have not been properly addressed and aired properly.	See responses to Comment Nos. 3-2 and 7-1 to 7-122 (general response).

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7-628	A. Rex Broussard	10/20/02	OP	a. Opposes the I-49 Connector through Lafayette because commentator states it would be too dangerous and the Teche Ridge alignment would be more cost effective.	See responses to Comment Nos. 3-4 and 4-5 (h).
7-629	John A. Hagelin	10/23/02	OP	a. Requests that the Teche Ridge route be considered because the commentator states it would eliminate heavy traffic from a large residential section of town and be more cost effective.	See responses to Comment Nos. 3-4 and 4-5 (h).
			CH, RB	b. Concerned that the current proposed alignment would adversely affect a historic district, churches and schools along the route, and require relocation of many residences and businesses.	See responses to Comment Nos. 7-626 (f), 3-6 (c) (3 <sup>rd</sup> bullet), and 6-1 (2 <sup>nd</sup> bullet).
			HW	c. Concerned with the possibility of hazardous chemical spills on the proposed roadway structure.	See response to Comment No. 7-621 (b) (1 <sup>st</sup> bullet).
7-630	Mary Beck	10/23/02	RD	a. Requests that a public hearing be held for the FEIS and the comment period be extended to 60 days.	See response to Comment No. 3-2.
7-631	Jane H. Phillips	10/26/02	OP	a. Opposes the I-49 Connector project because the commentator is concerned about the elevated structure running through the city and its visual impacts.	See response to Comment No. 7-621 (a) (2 <sup>nd</sup> bullet).
			EE	b. States the proposed plan does not adequately provide for a safe hurricane evacuation route.	See response to Comment No. 4-5 (i).
7-632	W. H. Armentor (Newspaper Article written by Camille Lapeyrouse)	10/10/02	AL, EE	a. Opposes the I-49 Connector through Lafayette. Prefers an alternate route around the city such as the Teche Ridge route through St. Martin Parish. States this route could be less expensive and be built in less time to provide for hurricane evacuation.	See responses to Comment Nos. 3-4, 4-5 (h), and 4-5 (i).

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7-633	Carey Hamburg	10/28/02	OP	<p>Requests that the proposed project continue to be studied for the environmental, economical, and social impacts in the area and rejects the FEIS. The following issues were addressed by the commenter to support his view:</p> <p>AL</p> <ul style="list-style-type: none"> <li>a. Page 4-1 – Does not feel the FEIS included a wide variety of alternatives. States the six primary alternatives analyzed are too similar to one another because they all generally follow the Evangeline Thruway alignment.</li> <li>b. Page 4-16 – Concerned with the social justice impacts of the project on the minorities in the area. Also questions the accuracy of the FEIS because 2000 census data was not reported in the tables.</li> </ul> <p>HE</p> <ul style="list-style-type: none"> <li>c. Page 4-26 &amp; 4-28 – States that the figures used to report data on replacement housing was not current information. States that if more current data were used in this section, the impacts would have been greater.</li> </ul> <p>RB</p> <ul style="list-style-type: none"> <li>d. Page 4-28 – Points out that this section of the FEIS reports that some displaced businesses may not remain in operation at another location. States that the local residents (low income) will be affected by this and their quality of life will be impacted negatively.</li> <li>e. Page 4-42 – Disagrees with the FEIS reporting that the connector will not increase walking or driving time. The connector will not increase walking or driving time. The</li> </ul> <p>RB</p> <p>CIR</p>	<p>Comment noted. See responses following.</p> <p>See response to Comment No. 3-4.</p> <p>Regarding social (environmental) justice, refer to response to Comment No. 7-649 (b).</p> <p>When available and applicable, census data from the year 2000 was analyzed and reported in the text of the FEIS (Sections 3.2.2 &amp; 4.2.2) to verify that the trends previously reported in the 1992 DEIS and 2000 DEIS (based on 1990 census) were still applicable.</p> <p>Comment noted. The replacement housing data used in the document was the most current information available at the time of the study. Actual market conditions at the time of relocations may vary in either direction from those noted during the study.</p> <p>Comment noted. The LCG Corridor Preservation and Management Action Plan contains policies that will address the development and redevelopment of the study corridor over time.</p> <p>Local access and circulation goals to maintain the vitality of the existing street network and access to</p>

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				<p>commentor states that pedestrian traffic will be hindered due to fewer cross streets, higher traffic, and dangerous under-pass areas. Also concerned with impacts to local traffic during construction.</p>	<p>abutting properties will be fulfilled by using the Selected Alternative because it allows the major cross streets (and many local streets) to remain open. (See Section 4.5.2 of the FEIS). Minor redirection of some pedestrian and vehicular traffic may occur. Provisions for enhancing the under bridge areas and allowing for pedestrian traffic will be further studied and public input will be sought during the compilation of the joint use development plan. During project construction, traffic will generally remain on the existing at grade Evangeline Thruway while the I-49 Connector is constructed. Following construction, the Evangeline Thruway will serve as parallel frontage roads. Much of the existing ground level Thruway traffic is expected to be diverted to the elevated freeway, thus, improving ground level pedestrian circulation opportunities.</p>
CP	f.	Page 4-47 – Does not feel the FEIS or LCG I-49 Corridor Preservation and Management Action Plan gives hope that the visual impacts of the elevated structure will be mitigated. Concerned that the LCG will not be able to fund mitigation measures discussed.			<p>The Memorandum of Agreement (MOA) (FEIS Appendix F) amongst LaDOTD, FHWA, LCG, and SHPO has been established as a basis for mitigating the adverse visual effects of the project on the historic properties in the Sterling Grove Historic District neighborhood. Because the MOA is a legally binding document, the provisions listed within the document are required at a minimum by LaDOTD and FHWA. An enhancements and joint use development plan will be developed to include additional concepts that may be used in the design of the project. The combination of state, federal, and local funding will be required to complete these improvements, but will not be allocated until the project moves forward.</p>

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	CH			g. Page 4-53 – States the mitigation measures discussed in the FEIS for mitigating the Sterling Grove Historic District are not sufficient. Concerned that the under-road areas will not enhance the area.	See response above.
NOI				h. Page 4-66 & Page 4-69 – States that using a 19' barrier on the elevated interstate would be destructive with hurricane winds. Does not believe the FEIS contains effective noise mitigation. States the noise should be mitigated or another route chosen.	Comment noted. See response to Comment No. 3-4 regarding alternative routing. See response to Comment No. 7-639 (c) regarding noise mitigation.
WE				i. Page 4-83 – Concerned with the wetland impacts reported in the FEIS due to the extension of Runway 11-29. Requests that an extensive study of the wetland habitat should be conducted.	Studies have been conducted regarding the wetland impacts associated with the project. It has been determined that a permit from the Corps of Engineers will be required for mitigating the impacts the extension of Runway 11-29 will have on Bayou Tortue. Refer to Comment No. 1-1.
7-634	Sally Donlon	10/28/02	WE	a. Does not feel the FEIS addresses Bayou Tortue and Bayou Vermilion as important catch basins for potential flood waters during heavy rains or as recharge areas for the Chicot Aquifer.	The function of these bayous and surrounding marshland to hold runoff and potential floodwaters are addressed in the FEIS (Section 4.3.1). This function will not be impacted by the project. No impact to the Chicot Aquifer recharge areas, which lie north of the study area, will occur. The FEIS (Section 4.3.3) discusses the wetlands impacted by the project and the potential methods of mitigation, which have been committed to in Table S-2 of the FEIS.
LRA, WE				b. States that the future expansion of Lafayette Regional Airport (LRA), which would impact Bayou Tortue with or without the proposed project, should not be a factor in the decision making process for the route of I-49 Connector. Urges LaDOTD to protect the wetlands and not be influenced by the LRA plans.	Comment noted.

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7-635	Harold J. Schoeffler	10/30/02	ED	a. States that the FEIS fails to deal with economic impacts such as loss of jobs, expected economic benefits, cost benefit analysis, tourism, loss of existing businesses, and loss of access to existing businesses. States an expert in the field of economics should have been listed as an author.	<p>Richard McGucken was the lead technical specialist regarding socioeconomic studies. As stated in Chapter 5 of the FEIS, he has 37 years of experience in socioeconomic studies. The items noted in the comment are addressed in the FEIS as follows:</p> <ul style="list-style-type: none"> <li>• Loss of jobs – The FEIS discusses both the creation of new jobs and the displacement of existing businesses (potential loss of jobs). Section 4.2.2.f discusses construction jobs anticipated to be created due to the project. The project is also expected to enhance the climate for economic development in the region (FEIS, Section 4.2.2.f). Section 4.2.2.c and Table 4-3 of the FEIS note the estimated number of employees to be displaced by the project. Not all of these employees would lose their jobs because some number of these businesses would reopen at new locations.</li> <li>• Economic benefits – Implementation cost estimates and numerous benefits including travel time savings, construction employment, increased mobility, increased hurricane evacuation, and other economic development opportunities have been identified for the proposed action as described in the FEIS.</li> <li>• Cost and benefit analysis – See response to Comment No. 7-1 to 7-122 (a) (4<sup>th</sup> bullet).</li> <li>• Tourism – Facility will improve access to the city and the downtown. The local community, including the Downtown Development Authority,</li> </ul> <p>*The first number in the comment number classifies the comment into one of the following categories: 1) Federal Agencies, 2) State Agencies, 3) Regional or Local Agencies, 4) Private Organizations or Groups, 5) Public Services, 6) Corporations/Businesses, 7) Other Interested Persons. The second number is an arbitrary number assigned to each comment within a category.</p> <p>**Subject codes referenced in the table for each comment are as follows: AL=Alternatives; AQ=Air Quality; BIO=Biological Resources; CON=Construction Impacts; CH=Cultural/Historic; CIR=Circulation/Traffic; C/N= CEQA/NEPA Issues; CP=Corridor Preservation; CUM=Cumulative Impacts; EE=Emergency Evacuation Route; ED=Economic Development; FN=Funding; HE=Human Environment; HW=Hazardous Waste/Materials; LRA=Lafayette Regional Airport; LU=Land Use; MM=Mitigation Monitoring; NOI=Noise; NR=No Response; OP=Opinion; PN=Purpose &amp; Need; RD=Request for Data; RB=Residential/Business Relocation; TR=Transit; WE=Wetlands; WR=Water Resources; 4F=Section 4(f); 106=Section 106 Documentation.</p>

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				<p>has actively been involved in the project and supports the project as shown in their comment submitted 10/31/02 (See Comment No. 3-5).</p> <ul style="list-style-type: none"> <li>• Loss of existing business – Relocations and right-of-way acquisition (including parking lots) at the airport will be handled in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments of 1987.</li> <li>• Loss of access to existing business – Within the limits of the proposed I-49 Connector project, access to homes and businesses will continue to be provided by the existing Evangeline Thruway that will remain in place with minor modifications.</li> </ul>	<p>The Joint Cooperative Endeavor Agreement (JCEA) (FEIS Appendix G) between LaDOTD and LCG identifies a minimum level of funding to be available annually for the I-49 Connector project. Additional funding will be sought in the next federal highway legislation to be developed in 2003.</p> <p>Also, see response to Comment No. 7-621 (c).</p>
FN				<p>b. Does not feel the FEIS deals with how this project will be funded and states that it needs to be investigated more fully to understand the impact it will have on the community.</p>	<p>The FEIS reports actual number of displaced residences due to the project. The LCG Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment discusses individual parcels of property within the "area of influence" that will fall under the guidelines contained in the preservation plan. Because the area of influence is larger than the area of</p>
RB				<p>c. Concerned with the inconsistencies reported by the FEIS and the parish corridor ordinance as to the number of displaced homes by the project. Also concerned that some displaced persons (minorities and low income) will not have the resources to relocate and that no resolutions have been made for the displacements of schools, churches, and businesses.</p>	<p>The LCG Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment discusses individual parcels of property within the "area of influence" that will fall under the guidelines contained in the preservation plan. Because the area of influence is larger than the area of</p>

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				required right-of-way and because each residence may be situated on more than one parcel; there is no inconsistency in the information reported.	
				In compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments of 1987, displaces as a result of the proposed project, including residents, businesses and one church, will be given fair compensation for relocation. A last resort housing plan for the project has been included as part of the LCG Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment (FEIS Appendix G).	
HW	d.	States the FEIS does not identify hazardous waste sites, underground storage tanks, and water wells.		The FEIS identifies storage tanks and hazardous waste sites on Exhibit 3-13 and water wells on Exhibit 3-15. A discussion on the current status of the waste sites in this area is contained in the FEIS in Section 3.2.8.	
HW	e.	States the FEIS fails to identify the high level of hazardous material trucks traveling at high speeds on the elevated freeway. Questions why alternatives routing hazardous materials around the community were not presented or investigated.		See responses to Comment Nos. 3-4 and 7-621 (b) (1 <sup>st</sup> bullet).	See response to Comment No. 7-621 (b) (1 <sup>st</sup> bullet). Regardless of the extent of a hazardous release, including the worst-case scenario, the Louisiana Department of Public Safety responds to the emergency and follows the warranted protocol. The release would be contained and cleaned up, to the maximum extent practical, by a company or companies that specialize in such business. The Louisiana Department of Environmental Quality, and possibly other public agencies, would become involved if the
HW	f.	Concerned that the FEIS does not address a worst case situation where hazardous material may spill into the Vermillion Bayou and impact some endangered species.			

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				site would require remediation.	
				See response to Comment No. 3-4.	
				See responses to Comment Nos. 7-618 (c) and 7-613 (a).	
				Air quality impacts throughout the corridor have been analyzed and reported in the FEIS (Section 4.3.4). The results of the analysis at the worst-case locations show that the proposed project will not cause or contribute to violations of the Carbon Monoxide (CO) National Ambient Air Quality Standards (NAAQS). Refer to Comment No. 2-1 (b) regarding LaDEQ concurrence with this finding and the methodologies and assumptions used.	
				Comment noted.	
				See general response to Comment No. 7-1 to 7-122 (a).	
				States that the noise levels for all the alternatives are unacceptable because it will cause many residences, churches, restaurants, hotels, and festivals to relocate at the expense of private and public entities.	
				Opposes the I-49 Connector project because it will bring major long-term changes to the community of Lafayette. States that the FEIS fails to deal with the long-term impacts of relocation of homes and families, churches, public facilities, social service agencies, loss of jobs, and many other issues hidden from view at this point.	
				States the FEIS fails to address the following issues regarding displacements and last resort housing:	
	Sarah Schoeffler	10/30/02	RB	Comment noted. See responses below.	

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				churches, 15 schools, and public service agencies are located on or impacted by the corridor. The commentor states that the FEIS has not sufficiently addressed them.	corridor. The FEIS (Section 4.2.3) also evaluates the impacts on these facilities and services due to the individual alternatives considered. It has been determined from this analysis that the one facility to be displaced by the Selected Alternative is Christ the King Church.
EE			b.	Concerned that the I-49 Connector will not provide for hurricane evacuation for south Louisiana residents especially during construction.	See responses to Comment Nos. 7-613 (a) and 7-618 (c).
HW			c.	Does not feel the FEIS sufficiently addresses the potential for wrecks and spills from hazardous cargo on the elevated highway.	See response to Comment No. 7-621 (b) (1 <sup>st</sup> bullet).
NOI			d.	States that the FEIS does not sufficiently address noise abatement for the project. Concerned that berms and shrubs will not hinder the noise from trucks braking and down gearing at exit and entrance ramps.	Comment noted. Noise levels and projected impacts are discussed in Section 4.2.10 of the FEIS. Within this section is a discussion regarding noise abatement measures (Section 4.2.10.b). It has been determined from these analyses that LaDOTD and FHWA will mitigate interior noise impacts at two schools in close proximity to the Selected Alternative as shown in Table S-2 of the FEIS.
AQ			e.	States that air quality is an issue not sufficiently addressed in the FEIS. Concerned for impacts to the young and the elderly.	See response to Comment No. 7-635 (i).
CH			f.	States that historical areas are not being considered. Specifically mentions an area called Freetown, which is not included in the FEIS.	Cultural resources within the corridor have been identified in the FEIS (Section 3.2.5) and the impacts to these historical sites have been evaluated (Section 4.2.4) in accordance with the Section 106 procedures (National Historic Preservation Act) in coordination with the State Historical Preservation Officer (SHPO). The Section 106 Adverse Effect Documentation (FEIS

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					Appendix E) reports that the project will have on an adverse visual effect on the Sterling Grove Historic District. No other impacts were determined to occur as a result of the project. LaDOTD and FHWA in coordination with the LCG and SHPO held numerous public meetings to receive input on possible mitigation measures and a MOA was developed to incorporate these provisions with the project. The MOA is contained in Appendix F of the FEIS. Freetown was settled prior to the Civil War, it later became part of the Mouton Addition. The SHPO determined that the Mouton Addition was not eligible for listing on the NRHP.
ED				g. Concerned that the FEIS does not address an economic loss the commentator states will occur to the downtown area. Mentions the rebuilding of the Old Train station adjacent to one route and the building of an extensive staging area for downtown events.	The local community, including the Downtown Development Authority, has actively been involved in the project and supports the project as shown in their comment submitted 10/31/02 (See Comment No. 3-5).
CIR				h. States the FEIS does not sufficiently address impacts to traffic flow and the community by closing cross streets. Opposes the use of underpasses for some cross streets because it may cause flooding.	See response to Comment No. 7-633 (e). Underpasses will be designed with sufficient pump capacity to avoid flooding during rainfall events.
AL				i. Opposes the I-49 Connector as presented in the FEIS because the alternatives are too similar to one another. Requests that alternatives to the east or the west of the city be considered before the positioning of the I-49 Connector is determined.	Comment noted. See responses to Comment No. 3-4.
7-637	Kevin Berry	10/31/02	AL	a. Opposes the I-49 Connector through Lafayette and prefers a bypass around the city instead.	See response to Comment No. 3-4.

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	OP			Facility will improve access to the city.			
	ED		b.	States the proposed project will not be conducive for travelers discovering a city and hence possibly doing business with the city.	Recent streetscape improvements constructed on Jefferson Street will not be impacted by the project. See response to Comment No. 7-636 (g).		
	CH		c.	Does not want to see the money spent recently on downtown revitalization to be lost. Refers to rebuilding of Jefferson Street and the old train station, and building the “Parks” for Festival International.			
	AL		d.	Concerned that the neighborhoods near the proposed interstate will not be able to thrive.	Comment noted.		
	AL		e.	Prefers a bypass around the city of Lafayette because states it would be less expensive, take less time to build, and be less of an inconvenience while it was being built.	See responses to Comment Nos. 3-4, 4-5 (h), and 4-5 (i).		
	7-638	Ed Bulliard	10/31/02	a.	States the I-49 Connector as presented in the FEIS will not benefit the economic development near the area surrounding the Evangeline Thruway. The commentator states that the low economic development on the existing Thruway is due to the high volume of truck traffic and noise it causes. States that routing through truck traffic around Lafayette would benefit the area instead of bringing it through the city.	Regarding economic development see response to Comment No. 7-635 (a). The through truck traffic will be traveling on the elevated freeway, thereby reducing impacts on existing Evangeline Thruway adjacent to businesses.	
	7-639	Jane Bulliard	10/31/02	NOI	a.	States that the noise levels presented in Table 3-10 of the FEIS ( <i>Comparison Between Measured and Modeled Data</i> ) cannot be evaluated without comparing the measured and modeled noise levels at the field sites to the LaDOTD Noise Abatement Criteria of 71 dBA for the sites. States that the table appears to show that the dBA levels decreased at all sites, but does not show that it is above the LaDOTD criteria.	As stated in the FEIS Section 3.2.7.b ( <i>Model Calibration</i> ), “Comparing the [computer] modeled noise levels to the measured noise levels allows for adjustment to specific site variables within the model and confirms the applicability of the computer model to the specific project.” The model was deemed acceptable because the difference in noise levels was within 3 dBA for all but one time period at one field

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NOI				<p>b. Points out that Table 4-9, which projects noise levels at various locations within the corridor to the year 2025, includes noise levels for field site nos. 1, 2, and 11 even though the noise levels at these sites were not modeled in Table 3-10 since the table notes that traffic could not be counted from these sites. Notes that all the noise levels for these field sites are above the LaDOTD criteria of dBA.</p>	<p>Table 3-10 presents the comparison of measured noise levels with computer modeled noise levels using the traffic data counted during the noise measurements. Table 4-9 presents the peak hour existing and future noise levels at 57 representative sites, including the Field Sites. The impact assessment is based on the results presented in Table 4-9. The three field sites in question exceed LaDOTD's 66 dBA criteria for all but FS-11 with Alternative RR-5 Elevated.</p>
NOI				<p>c. Table S-2, item #5 - States that the first two sentences used under traffic noise mitigation measures are relevant, but the sentences that follow refer to LCG participation and appears that it is unsupported by facts. States that the observations listed in the "Blue Book" as possible mitigation measures are not valid for the purpose of the FEIS. States that there is no mention of the Blue Book authors in the FEIS. Suggests that all reference to LCG be removed from the mitigation measures column of the traffic noise in the Summary.</p>	<p>The potential mitigation measures listed in Table S-2 that would be implemented by the LCG are possibilities for improving the noise conditions in the area. As stated in the FEIS, LCG has been actively involved in the EIS process and is aware that local funding would be used for noise mitigation (other than at the schools).</p>
NOI				<p>d. Concerned that local funding is not readily assumed for noise abatement.</p>	Comment noted.
7-640	Kelly Caldwell	10/31/02	AL	<p>a. Prefers the Teche Ridge Route instead of the I-49 Connector through Lafayette. States the routes presented in the FEIS for the I-49 Connector along the Evangeline Thruway are too similar and are not alternatives. Refers</p>	<p>See responses to Comment Nos. 3-4, 4-5 (h), and 4-5 (i).</p>

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				to a St. Martin Parish preliminary engineering study performed that indicates the bypass route would cost half than going through Lafayette and take one-third less time to construct. Questions whether the Teche Ridge route could be built as a supplement to the I-49 Connector due to lack of funds.	See response to Comment No. 7-621 (b) (1 <sup>st</sup> bullet).
HW	b.	Concerned with the risks of hazardous materials traveling through a populated area. Does not feel the risks are eliminated by elevating the highway.			See response to Comment No. 7-621 (b) (1 <sup>st</sup> bullet).
HE	c.	States that the project would impact the oldest and most vulnerable neighborhoods that contain the highest concentrations of minority, poor, and elderly residents.		The Selected Alternative, RR-4, has the least impact to the populated areas of the corridor compared to the other alternatives considered.	
NOI, AQ	d.	Concerned that the Sterling Grove Historic District would experience noise and pollution impacts in addition to the visual adverse effects reported to occur for the project. Questions why the noise receptors were placed along Evangeline Thruway where existing noise levels are high but not placed near the Sterling Grove Historic District where existing noise levels are low but expected to increase with the elevated freeway.		The EIS shows that there will be slight increase in noise levels for a majority of the corridor under all alternatives, including the no-build. Under the Selected Alternative, however, throughout the corridor noise levels immediately abutting the Evangeline Thruway, including noise levels at the St. Genevieve Church and School within the Sterling Grove Historic District, will decrease because the ground level Thruway will be relocated farther away from the existing church and school and because through traffic will use the I-49 Connector freeway (which will remove traffic from the local street). Although these noise reductions will be noticeable, the resulting levels will still exceed the LaDOTD's NAC and by definition the residences, schools and churches immediately abutting the Evangeline Thruway would still experience an acoustical impact. Sound walls and other noise reduction measures were considered but determined not practical and feasible according to the	

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CH, MM		e.	States that the MOA is useless because mitigation at the historic district will not make the project acceptable. Refers to provisions stated in the MOA to mitigate the area near St. Genevieve Church but states that there are no commitments specified for the remainder of the historic district.	Also, see responses to Comment Nos. 7-636 (d) and 7-635 (i).	Within the Sterling Grove Historic District the second and third tier of homes paralleling the Evangeline Thruway would be exposed to less noise than the St. Genevieve Church and School. These homes would most likely experience an increase from existing noise levels (because the ground level buffer provided by the existing buildings and vegetation would be less effective for an elevated noise source), but the increase would probably not be great enough to meet the LaDOTD's definition of impact.

- CH, MM
- e. States that the MOA is useless because mitigation at the historic district will not make the project acceptable. Refers to provisions stated in the MOA to mitigate the area near St. Genevieve Church but states that there are no commitments specified for the remainder of the historic district.

The MOA was approved by the SHPO and the Advisory Council on Historic Preservation (ACHP) and endorsed by the three committees of the Lafayette Metropolitan Planning Organization (MPO) and the Lafayette City-Parish Planning Commission as concurring parties. The St. Genevieve Catholic Church and School forms part of the Sterling Grove Historic District and borders the proposed I-49 Connector. Mitigative measures undertaken for the church apply to the District as an entity. As stated in the MOA (FEIS Appendix F), "During the development of the specific details for design and construction in the area, LaDOTD shall seek input from both St. Genevieve Catholic Church and School as well as provide opportunities for input by affected citizens and local government through a public involvement process.

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					Public involvement will occur prior to the formal submittal of the specific details to the SHPO for approval as specified..."
				f. States that the FEIS does not include historic properties located in the CBD, which may be impacted by the project. Concerned that the Old Railroad Depot which has been restored recently with federal transit funds will also be impacted by the project.	The Old Railroad Depot is located across the railroad from the Selected Alternative and will not be physically impacted. The Area of Potential Effect (APE) was determined by the Division of Historic Preservation. The APE includes only a portion of the Lafayette downtown area. The Railroad depot was determined eligible for inclusion on the NRHP in 1991. The structure was virtually destroyed by fire in 1998. As a result, according to a letter dated May 19, 1999 by the SHPO, the structure was determined to be not eligible for inclusion on the NRHP at the time of the 1998-1999 investigations.
				g. Concerned that the number of properties reported in the FEIS to be over 50 years old and eligible to be registered is not a valid number considering so many properties were evaluated. Disagrees with the FEIS where it reports that the properties identified in the study as eligible are not impacted by the project.	The historic qualities of properties, not the quantity, dictates their eligibility for inclusion on the NRHP. Project impacts are fully addressed in the Section 106 Adverse Documentation report (FEIS Appendix E).
				h. Does not believe the public meetings were adequate or depicted correctly in the FEIS, specifically the MOA public meetings and charrettes.	Comment noted. The meetings regarding the MOA were conducted by the MPO. Protocol issues arose that were addressed by the MPO and District Attorney.
				i. States that the Secretary of LaDOTD is supporting the I-49 Connector through Lafayette because he actively participated in the North/South Corridor Study which recommends the route along the Evangeline Thruway.	Comment noted.
				j. Requests that the current construction underway in the	The Evangeline Thruway widening project currently
CIR					

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				area, which includes widening of the Evangeline Thruway to 6 lanes and the Louisiana Avenue extension with new I-10 interchange, be considered.	The LCG has the authority to expropriate property only underway was considered as part of the no-build alternative analyzed throughout the FEIS. The Louisiana Avenue interchange was also considered in the MPO's computer model of future traffic conditions along with many other local plans expected to be built prior to or in conjunction with the I-49 Connector project (Section 1.3.1.d ( <i>Local Plans</i> ) and in Section 2.2.1.)
CP	k.	Concerned that the LCG Corridor Preservation Plan allows the LCG to expropriate property from the Sterling Grove Historic District because it states all properties within 500 feet of the project right-of-way will be subject to expropriation and other restrictions on property rights.			<p>The LCG has the authority to expropriate property only for public purposes established by the City-Parish Council and in accordance with state law. The LCG Corridor Preservation and Management Action Plan does not grant any additional authority. Properties anticipated to be needed for the right-of-way associated with the construction of the I-49 Connector Freeway are identified as Level I, and will be acquired by the LaDOTD, not LCG. It is the intent of the Lafayette Consolidated Government's (LCG) Corridor Preservation and Management Action Plan to work with property owners within 500 feet of the required right-of-way (Level II) to develop enhancements in portions of this "Transition Area". In order to accomplish this public purpose, LCG has the authority under existing state laws to purchase property, obtain easements, impose restrictions, or use its <u>expropriation</u> powers in order to establish design buffers and/or enhancements (urban forests or other components of the corridor plan) deemed appropriate by LCG's City Parish Council. Any acquisition of historic properties in the Level II Area would not occur except for preservation purposes. St. Genevieve Church is a recognized historic property within the Sterling Grove</p>

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Historic District and will be in the Level II Area.					
Reference is made to Section 6.22 <u>As Needed</u>					
7-641	Clayton Arceneaux	11/01/02	OP	a. States that currently the parish-wide selective political boards/commissions determine the fate of Lafayette city and other municipalities relative to codes, zoning, and land use. Questions the morality, ethics, and legality of such practice.	Comment noted.
			LU	b. Concerned that the city-parish government does not have a land use study. Questions how zoning, planning, and development can assert that the I-49 link will be compatible with current and future needs when the project is completed. States that the EIS refers to an inventory and analysis of land use in Volume I, but a document expected to provide guidelines, policy, and recommendations for the future was never prepared. Concerned decisions are being made without information.	Comment noted. There were two land use analyses conducted that included the I-49 Corridor.
					First, a district plan was developed by Lafayette Consolidated Government (LCG) Planning Staff and the Community Design Workshop of the University of Louisiana at Lafayette. All existing structures and empty vacant lots in the Corridor for two alternatives (EA-1 and RR-4) were mapped. Based on this inventory of existing structures, the teams mapped existing and proposed future land uses for the following types: Interstate 49, Proposed Water, Existing Structure, Existing Water, Proposed Residential, Proposed Multi-Use, Grass, Trees, Proposed Commercial, Plaza, Proposed Trolley, Proposed Public, Parking, and Streets. The proposed plan was utilized in a series of community charrettes for comments by residents who reviewed the plan for accuracy and appropriateness.
					The second land use plan is a major comprehensive parish-wide study initiated during the I-49 Corridor planning phase by the nationally recognized planning

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				<p>consultant firm HNTB. The study mapped existing land uses by broad categories (residential, commercial, industrial, and agricultural). A performance based land use plan is proposed based on this and other technical analyses. Additionally, public input was received from the community through a series of public meetings and reviewed by the Metropolitan Planning Organization's (MPO) committees (Citizen Advisory Committee, Transportation Technical Committee and the Transportation Policy Committee). The plan is now in final review by the MPO committees and will be submitted for approval to the City-Parish Planning Commission and City-Parish Council.</p> <p>The Corridor Preservation and Management Action Plan proposes to develop an overlay district to regulate land use in the Corridor. In part this plan will be based on these previous studies as well as additional input from the public. This plan is discussed in Section 6.5 of the Action Plan. Quoting that section,</p> <p>“Continued utilization of property in an orderly, intelligent, and logical manner taken together imply the need for zoning or more particularly, a zoning overlay district. The goal of such a district is the protection of public health, safety and welfare of the citizens of the parish. Indeed an overlay district (with boundaries co-contiguous with the Area of Influence) is needed to enable additional local land use controls to be implemented and are essential to the operation of the Land Bank, Housing Stock Preservation Plan, Economic Redevelopment Plan, and Set Back Plan.</p>	

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CIR				the area and does not give documentation or hard research data for the conclusions it makes.	See response to Comment No. 7-633 (e). One of the primary reasons the Selected Alternative was chosen for the proposed project is that it allows for better circulation and community cohesion by keeping many existing cross streets open under the I-49 Connector. As shown in the FEIS Volume II on Plates 1, 2a, 3, & 4b the Selected Alternative (RR-4 and MPO Subalternative) will keep many cross streets open for the proposed project including Pinhook, Taft, and Second/Third. Even though some streets may be closed, pedestrian movements will be maintained as possible.
AL, HE			i.	States that by closing 15 <sup>th</sup> , 16 <sup>th</sup> , Taft, Third, Second, Pinhook, Greg, Hobson, Samson, Goldman, and Bellot the poor, elderly, and minority population in the area will be impacted because it limits their mobility and thus quality of life.	See response to Comment No. 3-4.
HE			j.	Prefers an alternate route around the city instead of that proposed in the EIS because the commentor states it debilitates and isolates the poor, minority, and elderly in the area.	See response to Comment No. 7-633 (b).
HE			k.	States that more recent data other than the 1990 Census should have been used in the EIS.	The FEIS states that there is no significant difference in the impact to blacks from one alternative to another.
HE			l.	States that the EIS shows the elderly population in Tract 2 being negatively impacted by the proposed project because of its higher than average elderly population. Commentor questions why the elderly are targeted.	The Evangeline Thruway corridor has been designated for the proposed I-49 Connector route based on many factors. The impacts due to the various alternatives considered along the corridor were evaluated and reported in the FEIS. A primary reason that the Selected Alternative has been chosen is to minimize residential displacements, including elderly.
HE			m.	States the project will intentionally go through the Census tracts with a high percentage of black population	The FEIS states that there is no significant difference in the impact to blacks from one alternative to another.

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-642	James Hebert	10/2002	HW, NOI, AQ	(Tracts 1, 2, and 11). The commentator states this is a way for the rich and powerful to destroy a black power base by building an elevated highway.	See responses to Comment Nos. 7-621 (b) (1 <sup>st</sup> bullet), 7-635 (i).
7-643	Lisa M. Schile	10/28/02	BIO	a. Concerned with the potential impacts of the project such as hazardous wastes, noise, and pollution.  b. Concerned for the churches and residences affected by the proposed project.  c. Opposes the I-49 Connector through Lafayette and prefers a bypass, preferably to the east of the city he built as I-49. States the bypass route be less expensive to build with less disruption and in less time.	See responses to Comment Nos. 3-4, 4-5 (h), and 4-5 (i).
7-644	John Arcenaux	10/30/02	AL	a. States that the FEIS, with the exception of three heritage oaks, fails to quantify or discuss the negative impact this project would have on the community's tree population.  b. Due to the impact the project will have on Lafayette's urban forest, the commentator requests that the I-49 route through Lafayette be rejected and other alternatives be considered for the project	Vegetation will be removed as needed to construct the proposed project. New landscaping will be incorporated into the project in accordance with the MOA (FEIS Appendix F) and as identified in the joint use plan to be developed for the corridor. Landscaping including new trees will be provided throughout the corridor in conjunction with the project.  Comment noted. See response to Comment No. 3-4.
			OP	a. Opposes the I-49 Connector through Lafayette as presented in the FEIS. States the FEIS shows that the project is:  • too expensive,	Comment noted.
			FN		• See responses to Comment Nos. 3-4, 4-5 (h), and 7-123 to 7-312 (a).

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
	CON			<ul style="list-style-type: none"> <li>• will take too long to be built,</li> <li>• will cause traffic and hurricane evacuation problems,</li> </ul>	<ul style="list-style-type: none"> <li>• See response to Comment No. 4-5 (h).</li> <li>• Comment noted. See responses to Comment Nos. 4-5 (i).</li> </ul>
	CIR, EE			<ul style="list-style-type: none"> <li>• will cause immeasurable urban blight,</li> <li>• will be a drain on the resources of the city and parish where it will be built,</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted.</li> <li>• Comment noted. See response to Comment No. 7-635 (d).</li> </ul>
	OP				
	OP				
	HW			<ul style="list-style-type: none"> <li>• will impact hazardous waste sites, and</li> </ul>	<ul style="list-style-type: none"> <li>• Items 7, 8, and 9 in Table S-2 of the FEIS provide a list of commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process. See responses to Comment Nos. 7-621 (b) (1<sup>st</sup> bullet) and 7-635 (d).</li> </ul>
	OP			<ul style="list-style-type: none"> <li>• will harm the environment in ways that can not be conceived at this time.</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted.</li> </ul>
	MM, HE			<p>b. Concerned that the mitigation plans in the ‘Blue Book’ which include a linear park system and new commercial development alongside the project are insufficient because the EIS states that no businesses or houses or activity of any kind should be permitted within 750 feet of the proposed interstate.</p>	<p>A joint use development plan for the entire I-49 Connector corridor will be developed for the area within the right-of-way of the project. The joint use plan could include items such as landscaping, linear paths, parking, lighting, and other features. The joint use plan will be developed with public input from the people of the Lafayette area. This input will include consideration of ideas contained in the Blue Book, which is a planning tool developed by the LCG and local citizens.</p>
	HW				

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				Preserve the I-49 Alignment that is incorporated into a Joint Cooperative Endeavor Agreement amongst LaDOTD, FHWA, and LCG. This is a multifaceted plan that will enable corridor preservation since the project is anticipated to be built over time, as funding becomes available. Part of this plan includes guidelines that will enable informed and planned development for the areas adjacent to the I-49 Connector that are considered within the area of influence of the I-49 Connector. This plan will not prohibit development adjacent to the I-49 Connector but attempts to provide information that will promote development compatible with the corridor.	
				The FEIS does not make any statements that businesses or houses or other activity should not be permitted within 750' of the proposed interstate.	
				Comment noted.	
OP		c.		States that the proposed project through Lafayette will not improve commercial development in the area because adequate land is not available in this oldest part of town for "interstate development."	Comment noted. See response to 7-635 (a) regarding the economic analysis for the proposed project.
ED		d.		Does not feel the authors, noted as mostly engineers, are qualified to make an economic analysis for the proposed project. States a cost-benefit analysis should be performed before it proceeds. Concerned that the costs of the project, including jobs lost due to dislocated businesses, will not allow the city to see the benefits for a long time.	Generalized costs and benefits of the various elements of the proposed alternatives have been identified in the FEIS. A summary matrix is presented in Exhibit S-4 in the FEIS.
AL, ED, CH		e.		Prefers a route around Lafayette because it will improve economic development at a regional level and Lafayette will retain its historic appeal.	Comment noted. See response to Comment No. 3-4.

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-645	Martin Arceneaux	10/26/02	HW, MM	<p>a. Concerned that the cost, deadlines, and pressures of highway construction can provide the necessary safeguards to ensure that the Chicot Aquifer is not contaminated during construction by the hazardous waste sites identified in the FEIS.</p> <p>b. Concerned because the I-RA runway alterations would impact wetlands in the area.</p> <p>c. Concerned that an elevated interstate highway will have negative impacts on quality of life in the area, especially downtown.</p> <p>d. Concerned that the excessive cost of the project jeopardizes completion of I-49 south to New Orleans.</p> <p>e. Opposes the I-49 Connector through Lafayette and prefers the Teche Ridge route.</p> <p>f. States this alternate route would be more cost-effective, environmentally friendly, and quality of life enriching.</p>	<p>Items 7, 8, and 9 in Table S-2 of the FEIS provide a list of commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process.</p> <p>See responses to Comment Nos. 1-1, 3-6 (c) (4<sup>th</sup> bullet), and 7-633 (i).</p> <p>See response to Comment No. 7-636 (g).</p> <p>See response to Comment No. 7-123 to 7-312 (a).</p> <p>Comment noted. See response to Comment No. 3-4.</p> <p>Comment noted. See response to Comment No. 7-616.</p>
7-646	F.A. Fontenot	9/25/02	OP, CIR	<p>a. The same issues (bypass route around Lafayette and traffic circulation) were addressed in a previous comment by this commentator. See issues noted in Comment No. 7-616.</p>	Comment noted. Heightened awareness of homeland security issues is a recent development. Interstate highways and other freeways are recognized as a part of the Strategic Highway Network (STRAHNET) serving defense needs.
7-647	Paula Jenkins	10/29/02	AL	<p>a. Concerned that the I-49 Connector route through Lafayette poses several concerns from a civil defense perspective that could be alleviated or overcome by an alternate route around the city.</p> <p>b. States that the following concerns were not mentioned in the FEIS:</p>	

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## I-49 Connector Final EIS Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
7-648	Susan Landry	10/02/02	AL	<ul style="list-style-type: none"> <li>• Hurricane or other emergency evacuations would be stymied during the construction phase;</li> <li>• How interstate routes can be used by the criminal element to enhance their chances of evading the law.</li> <li>• Possibilities of terrorists targeting the railroad route which runs adjacent to the proposed I-49 Connector. States a chemical derailment or explosion that could affect interstate traffic would be extremely attractive to terrorists.</li> <li>c. States that there are neighborhoods all along the proposed route even though the FEIS denies it. Prefers a route around the city so that the way of life for these neighborhoods will not be affected.</li> </ul>	<ul style="list-style-type: none"> <li>• See response to Comment No. 7-618 (c).</li> <li>• Comment noted.</li> <li>• Comment noted.</li> </ul>
	HE			<p>c. States that there are neighborhoods all along the proposed route even though the FEIS denies it. Prefers a route around the city so that the way of life for these neighborhoods will not be affected.</p>	Comment noted. See response to Comment No. 3-4.
	CH			<p>a. Opposes the I-49 Connector through Lafayette. States that the LCG requested I-49 be routed through the city and the process that was set up did not provide for any real alternative routes.</p> <p>b. States the route proposed will divide the community and blight its downtown and historic areas.</p> <p>c. States that the route would increase air and noise pollution.</p> <p>d. Concerned that the route would not provide a detour</p>	<p>See response to Comment No. 3-1 to 3-4.</p> <p>See response to Comment No. 7-1 to 7-122 (a) (7<sup>th</sup> bullet).</p> <p>See responses to Comment Nos. 7-635 (i) and 7-636 (d).</p> <p>See response to Comment No. 7-621 (b) (1<sup>st</sup> bullet).</p>

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
AL				f. States that the FEIS fails to reveal the actual size and extent of this elevated highway. Does not feel the proposed roadway would fit within the current footprint of the Evangeline Thruway. States that portions of historic and downtown Lafayette would be obliterated.	Typical sections for the proposed elevated freeway and parallel roadways are shown on Exhibit 2-2. The Plates presented in the FEIS (Appendix A) show the plan and profile view of the alternatives considered. The Selected Alternative is shown on Plates 1, 2a, 3i, and 4b in Appendix A. For the Selected Alternative the proposed freeway swings away from the existing Evangeline Thruway. Displacements and impacts to historic properties have been evaluated and reported in the FEIS.
ED, EE				g. States the Teche Ridge route around Lafayette would provide economic development and safe hurricane evacuation and be quicker and less expensive to build.	See responses to Comment Nos. 3-4, 4-5 (h), 4-5 (i), and 7-618 (c).
AL, FN				h. States the Teche Ridge route could function as the eastern half of a much-needed loop around the city. Otherwise, the commentator states that the needlessly spent funds would become available to build the much-needed western (Ambassador Caffery extension) part of a loop, to alleviate traffic congestion in the area.	Comment noted. The proposed action is to improve traffic flow in the Evangeline Thruway Corridor. See response to Comment No. 3-4.
7-649	Ernal Farmer	10/26/02	OP	a. Supports the completion of I-49 to New Orleans because of its benefits to commerce and public safety, but is concerned about routing the I-49 Connector through Lafayette.  b. Concerned that the proposed project would have the following impacts:	Comment noted.
CH				• Oldest area in Lafayette would be visually impacted.	• See responses to Comment Nos. 4-4 (c), 7-633 (f), and 7-636 (f).
RB				• The elderly, poor, and minority residents would be displaced by the project.	• Comment noted. The Evangeline Thruway corridor has been designated for the proposed I-49

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
			CON		Connector route based on many factors. The impacts due to the various alternatives considered along the corridor were evaluated and reported in the FEIS. A primary reason that the Selected Alternative has been chosen is to minimize residential displacements.
			WE		
			AQ,		
			NOI		
			HW		
			EE		

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# I-49 Connector Final EIS

## Summary of Comments and Responses

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FN	c.	States that the proposed project would wholly or partially destroy improvements currently being constructed within the area. Does not want these recent investments lost. The commentator is concerned the proposed project would result in needless and excessive taxes.			will experience hurricane evacuation benefits. This and other aspects of the project purpose and need are fully discussed in Chapter 1 of the EIS.
ED, FN	d.	Stresses the regional and national importance for completing I-49 through Louisiana. The commentator does not want the cost of the proposed project to impede completion of I-49 and other projects in Louisiana and the nation.			See response to Comment No. 7-123 to 7-312 (a).
7-650	Jennifer LeBlanc	10/28/02	CIR	a. States the worst traffic problems are in the rapidly growing southwest area of the parish. States that the traffic along Evangeline Thruway is steady with some rush hour problems.  b. Concerned that elevated inner-city highways across the nation have not only failed to ameliorate problems or alleviate congestion, they have caused and contributed to many urban problems.	Comment noted. See responses to Comment Nos. 6-6 (b), 7-616 (c), and 7-620 (c).
OP				c. Concerned that poor planning should not be used to justify continued assault of those along the Thruway and of others this project would impact.	Comment noted.
RB				d. Concerned that the proposed project will have an impact on Lafayette's only urban neighborhoods where most residents are elderly, poor, and minority.	Comment noted. See response to Comment No. 7-1 to 7-122 (a).
					Comment noted. The Evangeline Thruway corridor has been designated for the proposed I-49 Connector route based on many factors. The impacts due to the various alternatives considered along the corridor were

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# I-49 Connector Final EIS

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				evaluated and reported in the FEIS. A primary reason that the Selected Alternative has been chosen is to minimize residential displacements.	
ED		e.	Concerned that the proposed project will impact the recent revitalization efforts downtown.	The local community, including the Downtown Development Authority, has actively been involved in the project and supports the project as shown in their comment submitted 10/31/02 (See Comment No. 3-5).	
RB		f.	Concerned for the businesses, schools, churches, tourism, and recreational facilities in the area.	Relocations and right-of-way acquisition will be handled in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments of 1987.	
RB		g.	Concerned that many small businesses along the Thruway could not survive relocation to higher cost areas.	See response above.	
HW		h.	Concerned that there are many documented dangerous and hazardous material sites along the proposed route and they may impact the Chicot Aquifer that lies beneath the Thruway.	Items 7, 8, and 9 in Table S-2 of the FEIS provide a list of commitments to avoid impacts to the Chicot Aquifer by employing appropriate techniques during the design and construction process.	
HW		i.	States that much of the heavy-hauling traffic on the Thruway is not local traffic and there should be a bypass route for long distance, dangerous hazardous materials.	Comment noted. See responses to Comment Nos. 3-4 and 7-621 (b).	
EE		j.	Concerned that the route to New Orleans as an interstate is vital for hurricane evacuation.	Comment noted.	
AQ, NOI		k.	Concerned that the proposed project would increase air and noise pollution.	See responses to Comment Nos. 7-635 (i) and 7-636 (d).	
BIO		l.	States the project would destroy trees and reduce green space. Concerned that the highway would visually impact the area.	Comment noted. Vegetation will be removed as needed to construct the proposed project. New landscaping will be incorporated into the project in accordance with	

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# I-49 Connector Final EIS

## Summary of Comments and Responses

Comment No.*	Commentator	Comment Date	Subject Code**	Issue	Response/Document Reference
				the MOA and as identified in the joint use plan to be developed for the corridor. Landscaping including new trees will be provided throughout the corridor in conjunction with the project.	
AL, OP	m.	Concerned that the I-49 project from Lafayette to New Orleans has been piecemealed into segments, one being the subject of the I-49 Connector FEIS. Concerned that if the I-49 Connector segment through Lafayette is approved, it would force the expensive and time-consuming completion of the rest of the route through the south corridor.	The I-49 Connector has independent utility and function as a stand-alone project, even if no other portions of I-49 south of Lafayette are constructed. See response to Comment No. 4-5 (oo). The construction of individual portions of I-49 south of Lafayette, each with independent utility, are not dependent on the construction of the I-49 Connector through the central corridor (or an east or west alignment around the developed area).		Comment noted.
OP	n.	States that the enormous cost – of money, of time, of human and natural environment, of our safety and security, of our quality of life- associated with any route of I-49 through Lafayette cannot be justified.	Comment noted.		Comment noted.
OP	o.	Stresses the importance of planning for roadway projects and accommodating the needs of the people. Quotes a source stating that urban planning and transportation planning is a social, psychological, ecological, economic, architectural, and engineering job.	Comment noted.		Comment noted.

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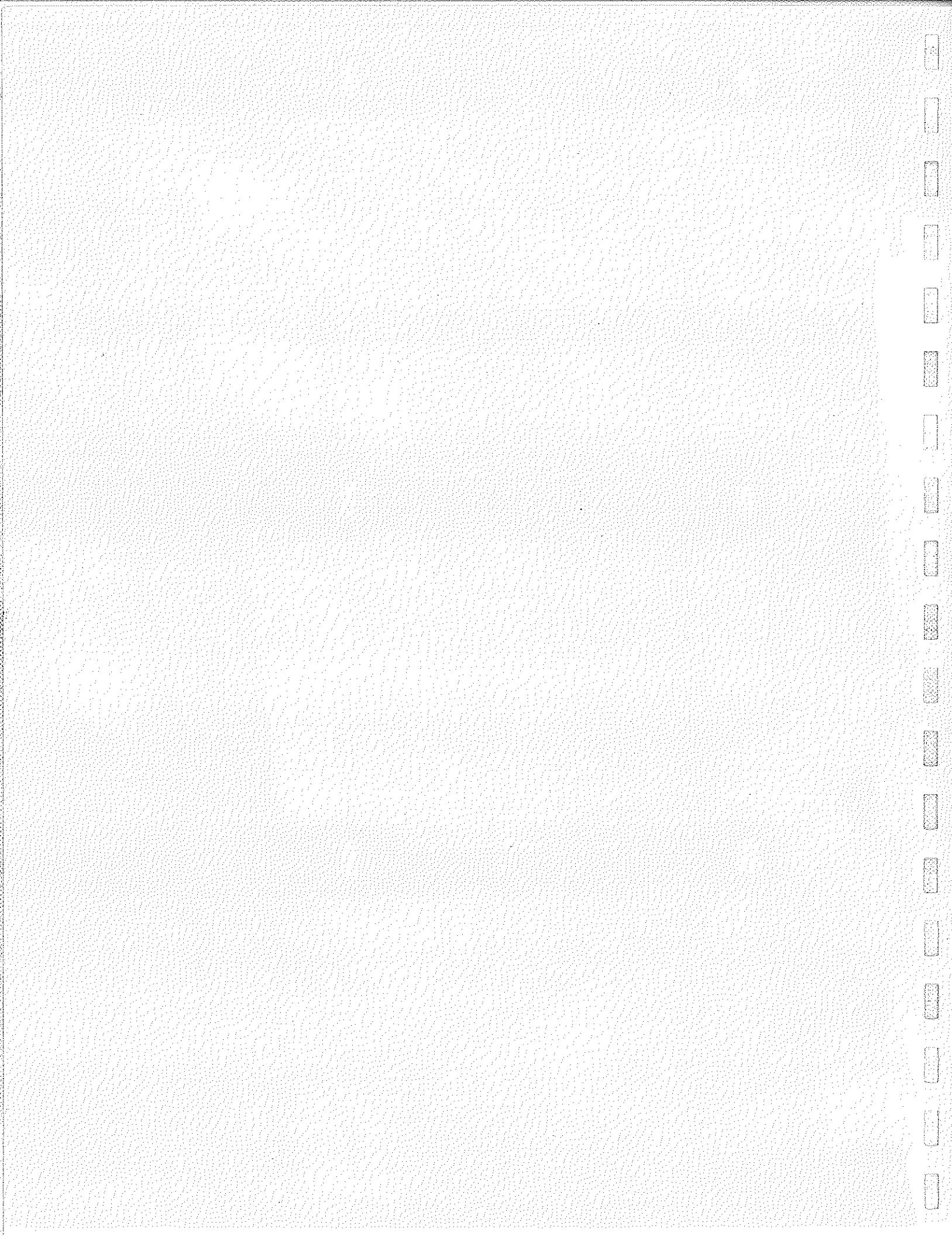
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## **APPENDIX B**

LCG Department of Traffic and Transportation  
MPO Comprehensive Plans:

-Evangeline Thruway Internal and External Traffic Study

-Interstate 49 Lafayette RR-4, Eastern Bypass,  
and Eastern Alignment Traffic Scenarios



## 0.0 Executive Summary

Using these three traffic modeling scenarios for trips along the Evangeline Thruway, we can summarize the analysis in the table below:

TABLE 0.0

LAFAYETTE CONSOLIDATED GOVERNMENT  
NUMBER AND PERCENTAGE OF MODEL TRIPS UTILIZING EVANGELINE THRUWAY  
INTERNAL AND EXTERNAL TRIPS  
FOR LAFAYETTE PARISH

Measurement	Model Trips			Total
	Internal-Internal	Internal-External External-Internal	External-External	
Average Number of Trips	26,520	19,880	4,690	51,090
Percentage of Total Trips	52%	39%	9%	100%

We will first explain our methodology and then explain our results in terms of specific percentages, and measures of the relationships.

## 1.0 Network

The network that we are using is the 2000 year network which has all of the transportation network streets existing in the year 2000 for Lafayette Parish. The reason we are using the 2000 year network is that it matches our 2000 census demographic data. The network is balanced in that it has a linear correlation coefficient of +0.96<sup>1</sup> of between existing and modeled traffic patterns with the parish. This level of accuracy is above the standard used by the Federal Highway Administration of +0.88.<sup>2</sup> The network is the result our staff's work and represents many hundred of hours of data collection, verification and data checking as well as analysis over a three year period.

<sup>1</sup> Technically, this value is the result of a regression analysis in which the linear correlation coefficient is +0.96, and a 95% level of confidence. A perfect (concomitant) relationship between two numbers which co-vary would be a linear correlation coefficient of +1.0. No relationship would be a linear correlation coefficient of 0.0. An inverse (negative) relationship in which a high number varies with a low number would be a linear correlation coefficient of -1.0. A correlation coefficient of +0.92 shows a strong relationship between two variables. The level of confidence means that if we took 100 samples of data, then 95 samples would have valid results; only 5 samples would be subject to error. A 95% level of confidence is typically used a standard to predict human behavior in the social sciences.

<sup>2</sup> Federal Highway Administration, Calibration and Adjustment of System Planning Models (Publication No. FHWA-ED-90-015) (No publication place given: December 1990), p. 35.

## 2.0 Demographics

We are using the 2000 year demographics (except for employment). The model utilizes the 2000 census figures plus locally collected 2000 year demographics (such as school attendance) to predict the number of trips produced for each of the 310 internal traffic zones and 35 external traffic zones. Except for employment figures, these demographics are the result of our staff's work. The employment figures are an estimate using the 1990 employment figures projected for the year 2000. These employment estimates were made in 1995 by a consultant, Neel-Schaffer Inc., while on contract with DOTD. We are in the process of doing a parish wide employment survey at the present. Once we are completed, these demographic figures will represent a significant investment of our staff time's to collection and verify this data set.

## 3.0 Assumptions

Using the demographics, we use a series of equations that predict the number of trips that will leave each zone and then end at each other zone in the parish. The network files uses formulas to calculate the shortest travel time based on the size and capacity of the network as well as the number of trips utilizing each segment of the transportation network. We have checked the results of our base year network and demographics to the traffic counting stations.

## 4.0 Traffic Counting Data

We have collected and then interpolated the DOTD traffic figures from 1985 to 2000. These are actual counts of vehicles which were then seasonally adjusted for an annual period. These numbers are issued about every 2 to 3 years. During the years without a count, we interpolated the values. These figures are the number of vehicles per day that pass at a certain point. We do not know the origin or destination of these trips. We have about 110 DOTD counting stations in the parish of which there are 8 stations along Evangeline Thruway. This data is the standard that we measure the accuracy of our modeling efforts.

## 5.0 Verification

Once we ran the scenarios which assigned traffic to the roadway network, we checked the results against the counting station data. This is a procedure to determine if our assumptions embedded in the design of the scenario led to traffic patterns that were not patterns typically found in the network. In fact, this is often the case as when an improvement is added and alters traffic flow dramatically, but in this case we sought to model existing traffic patterns without creating new patterns. We were not modeling new roadways, but rather types of trips.

We compared the counting station data along the Thruway and found that the modeled results matched the counting station data with a linear correlation coefficient of +0.92. As such, we exceed

the FHWA modeling standards of +0.88.<sup>3</sup> We also asked ourselves a further question: what chance is the correlation subject to chance? Perhaps the strength of the relationship might be low for the sample size. We performed a Fisher Z transformation test that either predicts a significant relationship not due to chance or a non-significant relationship in which chance may explain the figures. In this case, we found that the relationship is significant.

## 6.0 Question and Answers

The basic research question is "What is the percentage of trips on the Evangeline Thruway?".

The Evangeline Thruway is defined as US Highway 90 from the parish line at St. Martin Parish near Le Triomphe subdivision and continuing to the Interstate 10 and Interstate 49 cloverleaf.

In order to answer our research question, we modeled three traffic scenarios on the Evangeline Thruway. Scenario 1 modeled all trips that begin and end in Lafayette. These trips are referred to as Internal-Internal trips because their origin and destination are both internal to the parish. In Scenario 2, we modeled the remainder of trips (not included in Scenario 1). These trips in Scenario 2 are all trips with an external component. There were three kinds of trips in Scenario 2: (A) trips whose origin and destination are outside the parish (external-external trips); (B) trips whose origin was inside the parish, but whose destination was outside of the parish (internal-external trips); (C) and trips whose origin was outside the parish, but whose destination was inside of the parish (external-internal trips). These three trips types were summed into one total. We next modeled Scenario 3 which was only those trips whose origin and destination was outside of the parish (external-external trips).

We thus have three sets of figures based on the Scenario which generated the traffic prediction:

Scenario 1: Internal to Internal Trips

Scenario 2: External to External Trips, Internal to External Trips, and External to Internal Trips

Scenario 3: External to External Trips

We can then provide the following formulas, actual values and percentages as modeled on the Evangeline Thruway by type:

Formula 1:

Scenario 1	+	Scenario 2	=	All Trips
26,520	+	24,570	=	51,090
52%	+	48%	=	100 %

Formula 2:

<sup>3</sup> See Footnote one for the technical meaning of this value and the level of confidence that was used to generate this figure. See footnote 3 for the citation of modeling standards.

Scenario 2	- Scenario 3	= Internal to External and External to Internal Trips
24,570	- 4,690	= 19,880
48%	- 9%	= 39%

The number of external-external trips (Scenario 3) at first glance was relatively low being 9%. We cross checked the last available survey<sup>4</sup> of drivers as performed jointly by Sellers, Dubroc and Associates, a local Lafayette Louisiana civil engineering consultant, and Wilbur Smith Associates, an international traffic modeling consultant. The consultants surveyed drivers during the Spring of 1991 at certain external station in Lafayette Parish. One station where drivers were surveyed was US 90 South with a traffic count of 20,343 of which 15.9 percent were external-external trips. Thus, the total external-external trips at this point was 3,235 trips. We also queried with L.P. Ledet, a consultant with Neel-Schaffer Inc., who is planning to conduct the next external-external driver survey for Lafayette Parish in the next 18 months. Mr. Ledet cited a similar figure of 15% as a typical number of external-external trips in urban areas (like Lafayette) with populations of 100,000 to 250,000.<sup>5</sup> We searched our planning library and found a second reference to a 15% standard for cities with a population of 100,000 to 250,000.<sup>6</sup> Furthermore, the current DOTD average daily traffic (ADT) of the traffic entering Lafayette Parish on US Hwy 90 near the St. Martin Parish Line is 24,822 of which 15.9% would be 3,947 trips entering the parish as external-external trips. Thus, we have several estimates, all of which mutually supports estimates as ranging from about 3,000 to 5,000 external-external trips.

Thus, a modeling estimate of external to external trips using the Thruway of 4,690 is a figure which is valid and reasonable.

## 8.0 More Information

This is a summary of a complex set of calculations and graphic map files. If more data is required, please make a specific request so that we may query our data. Draft 1.0 (November 19, 2002) of this report was circulated for comments and a request was received to provide the number of external to external trips (Scenario 3) as a separate total. After completing these computations, portions of the report were rewritten to incorporate these totals into the existing computations and commentary.

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<sup>4</sup> Wilbur Smith Associates and Sellers, Dubroc and Associates, Technical Memorandum No. 3, Transportation Model Development and Calibration, Lafayette Transportation Plan (Lafayette, Louisiana, April 1991), Table 5, Page 10.

<sup>5</sup> Arthur B. Sosslau et al, Quick Response Urban Travel Estimation Techniques and Transferable Parameters, (Washington, DC 1978) National Cooperative Highway Research Program Report 187.

<sup>6</sup> Federal Highway Administration, Calibration and Adjustment of System Planning Models (Publication No. FHWA-ED-90-015) (No publication place given: December 1990), p. 31

## 0.0 Executive Summary

This report studied three alternatives for each of two demographic years producing six sets of traffic patterns. The three alternatives are Eastern Alternative, Eastern Bypass, and the Evangeline Thruway RR-4 Alternative as drawn on the attached map. The two demographic years are the 2000 census data set supplemented by local surveys and the 2012 projected data set. The traffic figures generated by these three alternatives and two demographic years were compared with existing conditions in Table 6.0 on page 6. The comparison seeks to determine which alternative is the most efficient in terms of certain modeling characteristics.<sup>1</sup>

This data permits the following conclusions to be drawn:

- (1) The most efficient proposed facility for the 2000 demographic year is the Evangeline Thruway RR-4 Alternative.
- (2) The most efficient proposed facility for the 2012 demographic year is the Evangeline Thruway RR-4 Alternative.
- (3) The amount of 2000 and 2012 trips on the facilities decreases from the westernmost alignment (Evangeline Thruway RR-4 Alternative) to the easternmost alignment (Eastern Bypass).
- (4) The demographic growth between 2000 and 2012 does not significantly increase the traffic demand for the Eastern Alternative and the Eastern Bypass. However, the traffic demand is slightly more for the RR-4 Alternative.

## 1.0 Networks and Alternative Alignments

There are two primary networks used in this report. The first is the existing network as constructed in the year 2000. The second network is the Financially Constrained Transportation Network (FCTP) as approved by the Lafayette Metropolitan Planning Organization (MPO). These primary networks are modified by introducing various improvements in the form of alternative alignments for the I-49 Connector.

<sup>1</sup> A more efficient alternative is one which is thought to carry more traffic without increasing network VMT and VHT and/or to move more MADT on the comparable roadway segments as further discussed in relation to Table 6.0.

## 1.1 Networks

The first primary network is the year 2000 existing network. The year 2000 existing network has transportation network roadways present in the year 2000 for Lafayette Parish. The reason we are using the 2000 year network is that it matches our 2000 census demographic data. The network is balanced in that it has a linear correlation coefficient of +0.96<sup>2</sup> between existing and modeled traffic patterns. This level of accuracy is above the standard used by the Federal Highway Administration of +0.88.<sup>3</sup> The network is the result our staff's work and represents many hundred of hours of data collection, verification and data checking as well as analysis over a three year period.

The second primary network is the Financially Constrained Transportation Network (FCTP). This network contains the projects for which the Lafayette MPO has approved transportation expenditures for a 20 year period as projected forward from 1995. We are in the process of developing a major update of the FCTP as part of an extensive traffic modeling study now underway.

## 1.2 Alternative Alignments

The two primary transportation networks are modified to create three specialized networks: the Interstate 49 (I-49) Eastern Alignment, the I-49 Eastern Bypass, and the Evangeline Thruway RR-4 Alternative. These alternatives are shown on the attached drawing, North South Corridor Alignments (dated 12/24/02).

The three alignments are described in the 1993 *Lafayette North-South Corridor Study*<sup>4</sup>. The 1993 Corridor Study contains five alternatives including a No Build Alternative. During the early phases of the I-49 planning process, four alternatives were rejected: Western Bypass (Alternative No. 1), Eastern Alignment (Alternative No. 2), Eastern Bypass (Alternative No. 4) and the No Build

<sup>2</sup> Technically, this value is the result of a regression analysis in which the linear correlation coefficient is +0.96, and a 95% level of confidence. A perfect (concomitant) relationship between two numbers which co-vary would be a linear correlation coefficient of +1.0. No relationship would be a linear correlation coefficient of 0.0. An inverse (negative) relationship in which a high number varies with a low number would be a linear correlation coefficient of -1.0. A correlation coefficient of +0.92 shows a strong relationship between two variables. The level of confidence means that if we took 100 samples of data, then 95 samples would have valid results; only 5 samples would be subject to error. A 95% level of confidence is typically used a standard to predict human behavior in the social sciences.

<sup>3</sup> Federal Highway Administration, Calibration and Adjustment of System Planning Models (Publication No. FHWA-ED-90-015) (No publication place given: December 1990), p. 35.

<sup>4</sup> The Design Team and The Lafayette Areawide Planning Commission, Lafayette North-South Corridor Study: "Path to Progress" (Lafayette, Louisiana: September, 1993)

Alternative. The alternative not rejected was Alternative No. 3, Evangeline Thruway. The two eastern alternatives (No. 2 and 4) are modeled in this traffic study. The Eastern Alignment is substantially within Lafayette Parish and traverses from south of Verot School Road to East Butcher Switch Road. A section of the Eastern Bypass is shared with the Eastern Alignment, but roughly half of the Bypass is outside of Lafayette Parish. The Eastern Bypass then turns east and connects to the existing portion of I-49 near La Hwy 726.

The third network presented in this report is the RR-4 Alternative as described in the Environmental Impact Statement<sup>5</sup> and the book, "The Lafayette I-49 Connector Project" known locally as the "Blue Book", a collaborative publication by the Community Design Workshop of the University of Louisiana - Lafayette and the Lafayette MPO.<sup>6</sup> This third alternative utilizes the existing Evangeline Thruway from I-10 Cloverleaf to Second and Third Streets. At that point it veers to the main east/west rail line and traverses parallel to the rail line to Taft Street before continuing and connecting back to the existing Evangeline Thruway near Pinhook Road. The proposed alternative ends at the intersection of Kaliste Saloom Road.

## 2.0 Demographics

The model utilizes the 2000 census figures plus locally collected 2000 year demographics (such as school attendance) to predict the number of trips produced for each of the 310 internal traffic zones and 35 external traffic zones. Except for employment figures, these demographics are the result of our staff's work using local surveys as well as 2000 census data. The employment figures are an estimate using the 1990 employment figures projected for the year 2000. These employment estimates were made in 1995 by a consultant, Neel-Schaffer Inc., while on contract with DOTD. We in the process of doing a parish wide employment survey at the present. Once completed, these demographic figures will represent a significant investment of our staff time's to collection and verify this data set. Similarly, we are in the process of planning an external trip survey in the next 18 months to estimate traffic entering the study area to update our 1991 external trip survey. In order to estimate external trips, we projected an increase of external traffic using 1% increase per year.

The 2012 demographics are straight line projections of the 2000 year demographics. Each year forward is increased 1.25 % per year for a total increase in each of the demographic variables at a total rate of increase of 15% (12 x1.25). The rate of increase is pro-rated from the Louisiana Department of Transportation and Development estimate for Lafayette Parish population growth for the next 30 years.

<sup>5</sup> Federal Highway Administration and Louisiana Department of Transportation and Development, I-49 Connector, Lafayette, Louisiana, Final Environmental Impact Statement (No publication place given: August 29 and 30, 2002), Exhibit 2-3C, Schematics Layouts of Alternatives (RR-4 Elevated and RR-5 Elevated).

<sup>6</sup> Thomas C. Sammons et al, Lafayette I-49 Connector Project, University of Louisiana- Lafayette and Lafayette Consolidated Government Metropolitan Planning Organization: (Lafayette, Spring, 1999)

### 3.0 Assumptions

Using the demographics, we use a series of equations that predict the number of trips that will leave each zone and then end at each other zone in the parish. The network files uses formulas to calculate the shortest travel time based on the size and capacity of the network as well as the number of trips utilizing each segment of the transportation network. We checked the results of our base year network and demographics to the traffic counting stations.

The modeled capacity and speed on the proposed alignments are equal to the existing capacity and speed of the existing Interstate 10 and 49. The assumed capacity of each alignment is based on a limited access freeway with a total modeled average daily trips of 69,000. Each of the two directions of travel would have a capacity of 34,500. For each direction of travel, there are two lanes, each with a capacity of 17,250 modeled average daily trips. The modeled speed is 60 miles per hour.<sup>7</sup>

The interchanges for each alternative are limited to significant connections along the existing transportation network. The Eastern Alignment has diamond interchanges at south of Verot School Road, Carmel Drive, I-10, and Moss Street. The Eastern Bypass interchanges has diamond interchanges at south of Verot School Road, Carmel Drive, I-10, East Gloria Switch Road, and LA Hwy 726. The interchanges at I-10 (which is now under construction) are modeled as full diamonds in model year 2000. However, the I-10 interchanges in 2012 are modeled as modified split diamonds as the roadway is updated to handle an intersection between interstates.

### 4.0 Traffic Counting Data

We have collected and then interpolated the DOTD traffic figures from 1985 to 2000. These are actual counts of vehicles which were then seasonally adjusted for an annual period. These numbers are issued about every 2 to 3 years. During the years without a count, we interpolated the values. These figures are the number of vehicles per day that pass at a certain point. We do not know the origin or destination of these trips. We have about 110 DOTD counting stations in the parish of which there are 8 stations along Evangeline Thruway. This data is the standard that we measure the accuracy of our modeling efforts for our base year network. We also use this data standard to check the validity of modeling new roadways for reasonableness as we project our figures forward.

<sup>7</sup> The proposed RR-4 alternative along the Evangeline Thruway is proposed to be a six lane facility. The reader should note that the project as modeled as a four-lane facility is appropriate in order to match the capacities of the other alternatives, and the four-lane facility is satisfactory to meet demand predicted to be needed in the 12-year period between 2000 and 2012. This approach enables a direct comparison of the various alternatives.

## 5.0 Verification

Once we ran the base year 2000 scenario which assigned traffic to the base roadway network, we checked the results against the counting station data. This is a procedure to determine if our assumptions embedded in the design of the scenario led to traffic patterns that were not patterns typically found in the network. In fact, this is often the case when an improvement is added and alters traffic flow dramatically, for example, when we added freeways to our transportation network like in this study.

We compared the counting station data along the Thruway for the base 2000 transportation network. We found that the modeled results matched the counting station data with a linear correlation coefficient of +0.92. As such, we exceed the FHWA modeling standards of +0.88.<sup>8</sup> We also asked ourselves a further question: what chance is the correlation subject to chance? Perhaps the strength of the relationship might be low for the sample size. We performed a Fisher Z transformation test that either predicts a significant relationship not due to chance or a non-significant relationship in which chance may explain the figures. In this case, we found that the relationship is significant.

## 6.0 Traffic Modeling Results

There were seven sets of traffic data generated in the course of preparing this report. There were three alternatives: Eastern Alignment, Eastern Bypass, and the Evangeline Thruway RR-4 Alternative. For each alternative, traffic predictions were based on two sets of demography: 2000 census demographics and 2012 projected demographics. The 2000 census demographics correspond to the existing 2000 transportation network. Similarly, the 2012 projected demographics corresponds to the 2012 Financially Constrained Transportation Plan (FCTP) network. We thus have three alternatives to be constructed in two demographic years. These six alternatives are then compared to the one year 2000 network to judge their impact.

Each of these alternatives were compared by using four parameters which estimates and quantifies traffic patterns. Two parameters, Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT), are measures of the total network and how efficient an alternative effects network performance. The VMT is the total of all trips occurring on the network throughout the parish. The VHT, similarly, measure the total of travel time for all drivers on the network. A reduction in these parameters generally indicates that the transportation needs are being served with less expenditure of miles traveled and hours traveled. The Modeled Average Daily Trips (MADT) averages the estimated number of trips on an alternative.

<sup>8</sup> See Footnote 2 for the technical meaning of this value and the level of confidence that was used to generate this figure. See footnote 3 for the citation of modeling standards.

The reader should note that MADT measures trips on the I-49 Connector alternative linking the beginning and end of the project. In contrast, the MADT on Evangeline Thruway is the average of the number of trips found on the existing Thruway as modified by an alternative RR-4 replaces the length of the Evangeline Thruway from Interstate 10 to near Donlon Avenue. However, the remainder of the Evangeline Thruway is preserved in the RR-4 alternative from near Donlon Avenue to its terminus near Surrey Street. The other model alternatives do not modify the Evangeline Thruway.

Table 6.0  
 Lafayette Metropolitan Planning Organization  
 Comparison of Traffic Patterns for Various Alternatives

Alternative	Network	Modeled Average Daily Trips (MADT) on I-49 Alternative	Modeled Average Daily Trips (MADT) on Modified Evangeline Thruway <sup>7</sup>	Vehicle Miles Traveled (VMT) on Entire Network	Vehicle Hours Traveled (VHT) on Entire Network
2000 Base Year	Base	----	46,446	5,776,724	13,511,322
2000 Eastern Bypass	Base	15,926	39,955	5,872,725	12,477,251
2012 Eastern Bypass	FCTP	18,576	43,520	6,750,429	13,702,054
2000 Eastern Alignment	Base	24,716	37,668	5,857,591	12,311,313
2012 Eastern Alignment	FCTP	25,297	41,088	6,735,933	13,540,191
2000 Evangeline Thruway RR-4	Base	58,263	31,128	5,450,723	11,720,915
2012 Evangeline Thruway RR-4	FCTP	66,170	31,985	6,722,581	13,654,363

An analysis of the table allows the following conclusions to be drawn:

(1) For the 2000 demographic year, the most efficient proposed facility is the Evangeline Thruway RR-4 Alternative. Efficiency is defined as a set of facilities which carries more traffic without increasing VMT and VHT. This alternative reduces the VMT from 5,776,724 to 5,450,723 and the VHT from 13,511,322 to 11,720,915. The two other 2000 demographic year alternatives are more than the 2000 base year network. Furthermore, the 2000 Evangeline Thruway RR-4 Alternative reduces the amount of trips on the ground level portion of the Evangeline Thruway the most (31,128) in comparison to the other 2000 demographic alternatives (37,668 and 39,955).

(2) For the 2012 demographic year, The Evangeline Thruway RR-4 Alternative is the most efficient proposed facility. The VMT and the VHT for the 2012 demographic year are nearly equal being approximately 6,700,000 and 13,600,000 for all alternatives. The alternative that moves the most traffic is the Evangeline Thruway RR-4 Alternative which has 66,232 daily trips on the elevated portion of the facility and 31,985 daily trips on the existing ground level roadway. These RR-4 trips total 98,155. This total is significantly more than the trips predicted by the other two

interstate alternatives and the ground level traffic on the Thruway: Eastern Alignment (66,385) and Eastern Bypass (62,096). These totals are excerpted from Table 6.0:

Alternative	Vehicle Miles Traveled (VMT)	Vehicle Hours Traveled (VHT)	Proposed I-49 Alternative	Modified Evangeline Thruway	Total Proposed and Elevated Alternatives
			Modeled Average Daily Trips	Modeled Average Daily Trips	Modeled Average Daily Trips
Eastern Alignment	6,735,933	13,540,191	25,297	41,088	66,385
Eastern Bypass	6,750,429	13,702,054	18,576	43,520	62,096
Evangeline Thruway RR-4	6,722,581	13,654,363	66,170	31,985	98,155

The difference in trips between the modeled trips of RR-4 in relation to the Eastern Alignment and the Eastern Bypass is more than 32,000 modeled trips. Some of these trips would necessarily be distributed through the transportation network without increasing the efficiency of the network.

(3) The amount of 2000 and 2012 trips on the facilities decreases from the westernmost alignment (Evangeline Thruway RR-4 Alternative) to the easternmost alignment (Eastern Bypass). One explanation for this distribution is that as one travels away from the central urban core of Lafayette Parish, there are less trips being generated and distributed. As such, the more distant from the central urban core of Lafayette that a facility is constructed, the less trips a facility is likely to carry.

(4) The demographic growth between 2000 and 2012 does not significantly increase the traffic demand for the Eastern Alternative and the Eastern Bypass. However, the traffic demand is slightly more for the RR-4 Alternative. We can excerpt these relationships from Table 6.0 in the table below:

Alternative	Demographic Year	Demographic Year	Increase Between 2000 and 2012
	2000	2012	
Eastern Bypass	15,926	18,576	2,650
Eastern Alignment	24,716	25,297	581
Evangeline Thruway RR-4	58,263	66,170	7,907

The significant changes from 2000 and 2012 is both a demographic increase and a change in transportation networks. The 2000 network contains only the existing transportation system. However, the 2012 network is significantly improved with the Financially Constrained Transportation Plan - FCTP (as described in Section 1.1 Networks). Because the demographic growth is paired with growth in an improved transportation network, the forecasted demand does not significantly increase for these alternatives being modeled.

## 7.0 More Information

This is a summary of a complex set of calculations and graphic map files. If more data is required, please make a specific request so that we may query our data. Draft 1.0 and subsequent drafts of this report was written and circulated among the staff for comments. The current draft is being submitted to FHWA and DOTD for review and comments.

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**2.5 MILES**

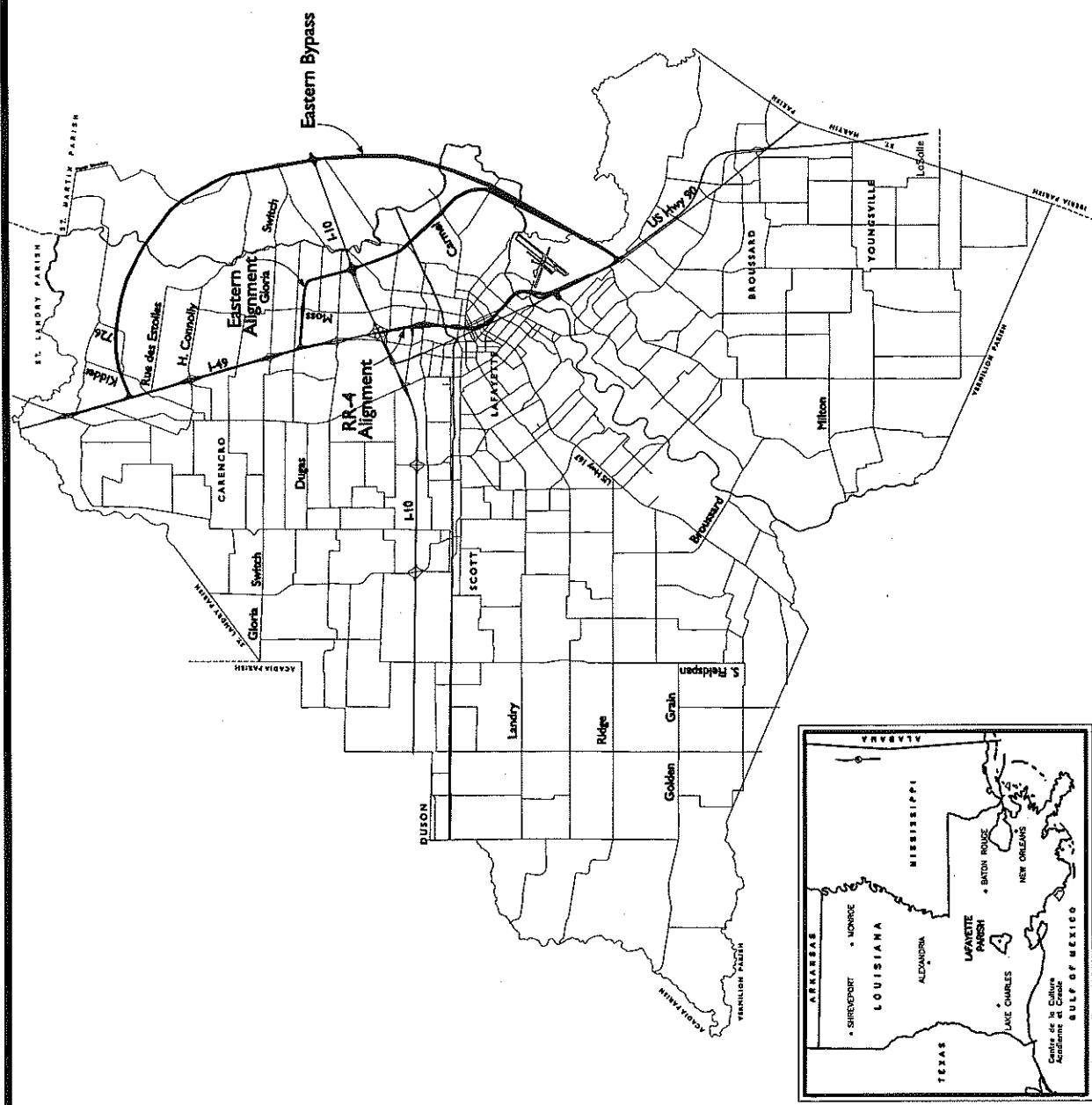
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NORTH SOUTH  
CORRIDOR  
ALIGNMENTS

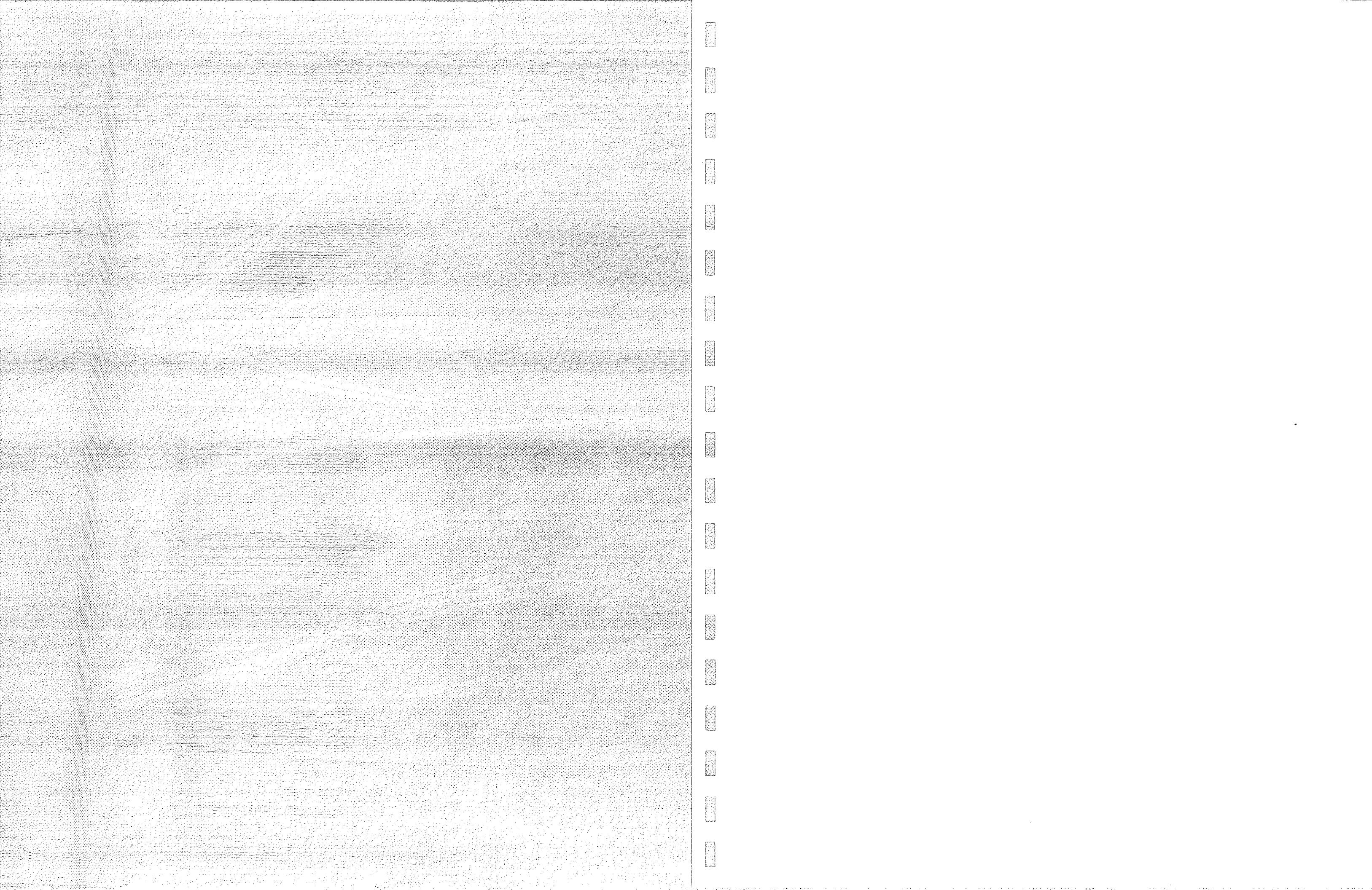
Lafayette Consolidated Government  
Traffic & Transportation Department



Metropolitan Planning Organization









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